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Date: Yry 16, 2007 Initial: CM Service

Facility Name: Washtehaw Industrial	Fre	alibertha	
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A.1 General Correspondence	1	B.2 Permit Docket (B.1.2)	
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.1 Correspondence	V	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	ý	C.1 Compliance - (Inspection Reports)	
.3 Part A Application and Amendments	/	C.2 Compliance/Enforcement	
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
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A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
.1 Correspondence	1	.1 RFA Correspondence	
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A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
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A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan り. よる	Ţ,
.2 Reports		.3 RFI Program Reports and Oversight	Ť
B.1 Administrative Record	1	.4 RFI Draft /Final Report	
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Tale - 29

.6	RFI QAPP Correspondence		.8 Progress Reports	
.7	Lab Data, Soil-Sampling/Groundwater	- ile	D.5 Corrective Action/Enforcement	
.8	RFI Progress Reports		.1 Administrative Record 3008(h) Order $\mathcal{D}_{\mathfrak{k}}\mathcal{F}_{\mathfrak{k}}$	
.9	Interim Measures Correspondence		.2 Other Non-AR Documents	
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,2	Interim Measures		.1 Correspondence	T
,3	CMS Workplan		.2 Reports	
.4	CMS Draft/Final Report	., .	F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5	Stabilization		G.1 Risk Assessment	T
.6	CMS Progress Reports		.1 Human/Ecological Assessment	\dagger
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.1	CMI Correspondence		.4 Ecological - Administrative Record	
.2	CMI Workplan		.5 Permitting	-
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.5	CMI QAPP		.8 Endangered Species Act	
.6	CMI QAPP Correspondence		.9 Environmental Justice	
		1	1	

Note: Transmittal Letter to Be Included with Reports.	
Comments:	



NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
GORDON E. GLYER
KERRY KAMMER
ELLIVOOD A. MATTSON
O. STEWART MYERS

RAYMOND POUPORE

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

4th Floor, State Office Building 301 E. Louis Glick Hwy., Jackson, Michigan 49201

October 31, 1989

Raymond Jusak
Manager of Environmental Facilities
Johnson Controls, Inc.
825 Victors Way
P.O. Box 1003
Ann Arbor, MI 48106

Dear Mr. Jusak:

Re: MID 980795512

On September 21, 1989, staff of the Department of Natural Resources, conducted an inspection of your facility located at 290 Monroe Street in Saline, Michigan, to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended, and Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended. Enclosed is a copy of the inspection report.

As a result of that inspection, staff of the Department have determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

- The inactive surface impoundment's fence no longer provides an adequate artificial barrier as required by 40 CFR 265.14(b)(2)(i). A section of fence knocked down by a fallen tree on the south side of the impoundment needs to be repaired.
- Three monitoring wells were not locked. Although the surface impoundment is located in a woods, it is not totally remote from residences in the area. It would be in your best interests to have the wells properly secured to prevent any tampering with them.

I am aware of the current debate over the regulatory status of your facility and would appreciate your continued cooperation in complying with the RCRA/Act 64 requirements.

Please respond to this letter by November 30, 1989 providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact

Sincerely,

Carolyn B. Parker

Environmental Engineer Waste Management Division

517-788-9598

CBP:1t

Enclosure

cc: Lonnie Lee, WMD

U.S. EPA

Mr. Joe Gorn Universal Die Cast 232 Monroe Street Saline, MI 48176

Re: MID 980795512

Dear Mr. Gorn:

The Department of Natural Resources has received the material you submitted on July 31, 1985 in response to deficiencies revealed in the July 16, 1985 inspection, which this Department performed as a representative of the U.S. Environmental Protection Agency to determine compliance with the provisions of the Resource Conservation and Recovery Act, (RCRA).

Your submittal has addressed the concerns that were raised as a result of the inspection, and is adequate demonstration of compliance with the provisions of RCRA evaluated at the time of the inspection. Compliance with these requirements does not limit the applicability of other provisions of the RCRA regulations. Staff will return to your facility to verify compliance.

Should you have any questions, please contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Lee Carter Water Quality Specialist 517-322-1300

LC/ms

cc: Hazardous Waste Division
U.S. EPA - Region V w/attachment

RECEIVED



AUG 02 1985

HAZARDOUS WASTE DIVISION

Corporate Office/Saline Plant 232 Monroe Street Saline, Michigan 48176 313-429-9411

RECEIVED

AUG 5 1985

Malvern Plant 1002 East Section Line Malvern, Arkansas 72104 501-332-3611

L'exion lit Hespidosifets

Little Rock Plant 8423 Frazier Pike Little Rock, Arkansas 72206 501-490-2413

JuJv 31, 1985

Mr. Lee Carter
Department of Natural Resources
Hazardous Waste Division
Langing, MI 48909

Dear Mr. Carter:

 $p_{\rm er}$ your letter of July 18, 1985, enclosed is the updated Contingency $p_{\rm Lin}$ for Universal Die Casting, Inc.

 $_{\rm Also}$ enclosed are copies of two notices supporting the appointment of $_{\rm Joe}$ Gorn to Operations Manager and now to Vice President of Saline $_{\rm Operations}$.

If any further information is required, please contact me.

Sincerely,

UNIVERSAL DIE CASTING, INC.

Ann M. Brown

Administrative Assistant

AMI/ddm

Enclosures

July 18, 1985

Joe Forn, Plant Manager Universal Die Cast 732 Monroe Street Saline, MI 48176

Re: MID 980795512

Dear Mr. Gorn:

On July 16, 1985, staff of the Department of Natural Resources, acting as representatives of the United States Environmental Protection Agency, conducted an investigation of your facility located at 732 Monroe in Saline, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. Attached is a copy of the inspection report.

As a result of that investigation, staff of the Department have determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

1. The contingency plan was not updated to reflect the change in emergency coordinator as required in 40 CFR 265.37(d).

We request that you respond to this letter by August 1, 1985 providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely.

HAZARDOUS WASTE DIVISION

Lee Carter Water Quality Specialist 517-322-1300

LC/ms

Attachment

cc: U.S. EPA - Region V
Hazardous Waste Division

November 13, 1984

Mr. Raymond Gallatin Universal Die Casting, Inc. Corporate Office/Saline Plant 232 Monroe Street Saline, MI 48176

Re: MID 980795512

Dear Mr. Gallatin:

The Department of Natural Resources has received the material you submitted on October 18, 1984 in response to deficiencies revealed in the July 31, 1984 inspection, which this Department performed as a representative of the U.S. Environmental Protection Agency to determine compliance with the provisions of the Resource Conservation and Recovery Act, (RCRA).

Your submittal has addressed the concerns that were raised as a result of the inspection, and is adequate demonstration of compliance with the provisions of RCRA evaluated at the time of the inspection. Compliance with these requirements does not limit the applicability of other provisions of the RCRA regulations. Staff will return to your facility to verify compliance.

Should you have any questions, please contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Lensing District

517-322-1300

REB/ms

cc: Hazardous Waste Division U.S. EPA - Region V /

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON E. R. CAROLLO MARLENE J. FLUHARTY STEPHEN F. MONSMA O. STEWART MYERS RAYMOND POUPORE HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING BOX 30028 LANSING, MI 48909

RONALD O. SKOOG, Director

October 30, 1984

M D 9807 95512

100

Ms. Mary Higgins U.S. EPA Region V 230 South Dearborn Chicago, Illinois 60604

Dear Ms. Higgins:

Enclosed for your records are updated copies of the Compliance and Enforcement Log and Facility Status Sheet for Universal Die Casting, Inc. in Saline, Michigan. These forms were completed as a part of our closure plan review.

If you have any questions concerning the attached information, please contact Hien Nguyen or me at (517) 373-2730.

Sincerely,

Kenneth Burda Chief, Permits Unit

Hazardous Waste Division

Enclosures

cc: J. Bohunsky

A. Howard

R. Basch

Mr. Raymond H. Gallatin Plant Manager Universal Die Casting, Inc. 732 Monroe Street Saline, MI 48176

Re: MID 980795512

Dear Mr. Gallatin:

On July 31, 1984, staff of the Department of Natural Resources, acting as representatives of the United States Environmental Protection Agency, conducted as investigation of your facility located at Saline, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. As a follow-up to that inspection you were sent a letter, dated August 14, 1984, outlining 11 deficiencies found during the inspection. In response, you sent a letter, dated September 5, 1984, which included various documents. I visited your facility and discussed the various deficiencies with Mr. Murray of your staff.

All issues have been resolved except for the training program required in 40 CFR Part 265.16. I indicated to Mr. Murray that the information submitted did not adequately address the training required. Specifically, the workers who handle hazardous waste need to receive appropriate training in various areas including, but not limited to, response to emergencies or spills, inspection and repair and replacement of emergency equipment. I recommended to Mr. Murray that he review 40 CFR Part 265.16, especially 265.16(a)(3) which indicates the minimum elements in a training program.

I would also recommend that your Company develop an index which describes the information being collected and the location in the plant of same to comply with the requirement to maintain an operating record in 40 CFR Parts 265.73, especially Section 265.73(b)2 through 265.73(b)7.

I would request that you respond to this letter by October 18, 1984 providing documentation to this office regarding those actions taken to correct these deficiencies.

Page Two October 3, 1984 Mr. Raymond H. Gallatin

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Robert E. Basch, Supervisor Lansing District 517-322-1300

REB/ms

cc: Hazardous Waste Division U.S. EPA - Region V/

D980795512

DIE CASTING, INC.

RECEIVE Saline Land Malvern Plant 1002 East Section Line Malvern, Arkansas 72104 501-332-3611 Corporate Office/Saline Plant Saline, Michigan 48176 Hoover University

Little Rock, Arkansas 72206 501-490-2413

September 5, 1984

Mr. Robert E. Basch, District Supervisor Hazardous Waste Division P.O. Box 3002B Lansing, Michigan 48909

Dear Mr. Basch:

This communication from Universal Die Casting, Inc. is in response to your letter of August 14, 1984 arising from your facility inspection of July 31, 1984.

A reiteration of issues you felt did not appear to be in full compliance and our actual status areas follows:

- The facility did not document all inspections and produce and inspection log as required in 40 CFR Part 265.15. Exhibit I)
- The facility did not document personnel training as requested in 40 CFR Part 265.16. (See Exhibit II)
- 3. The facility did not document attempts to make arrangements with local authorities concerning an emergency as required in 40 CFR Part 265.37. (See Exhibit III)
- The facility did not have an up to date contingency plan as required in 40 CFR Part 265.52. (See Exhibit III)

Original contingency plan 4/30/75 updated 2/9/84 did not include arrangements with local authorities. A new and much improved plan based on rules from federal and state environmental regulations has been developed. Encompassed in that plan are arrangements with local authorities for emergencies.

- The facility did not have an estimate of closure costs nor did the facility have an organized operating record as required in 40 CFR Part 265.73. (See Exhibit IV)
- The facility could not produce all records for inspection as required under 40 CFR Part 265.74. (See Exhibit IV and plant had other records)

September 5, 1984 Mr. Robert E. Basch Page 2

- 7. The facility could not produce groundwater sampling and analysis plan required under 40 CFR Part 265.92. (See Exhibit V)
- 8. The facility could not produce an outline of a comprehensive groundwater quality assessment program required under 40 CFR Part 265.93. (See Exhibit V)
- 9. The facility has not performed the statistical analysis required under 40 CFR Part 265.93 c(b). (See Exhibit V)

Enclosed are analytical results accumulated for the last three quarters for well monitoring. The fourth quarter well monitoring tests will be performed in September by Canton Analytical Laboratories. Statistical analysis (t-test) and assessment will be completed at that point as per 40 CFR Part 265.93 c(b), and forwarded.

- 10. The facility did not produce a complete closure plan for the waste treatment and storage lagoons as required in 40 CFR 265.112. (See Exhibit VI)
- 11. The facility did not produce logs or other documentation pertaining to the daily and weekly inspections of the lagoon required in 40 CFR Part 265.225 and 265.226.

Prior to February 1, 1984, under the ownership of Hoover Universal, the lagoons were improperly identified in Form 3 RCRA (Hazardous Waste Permit Application). The lagoons were listed as TOI, treatment tanks. On May 24, 1984, Mr. Allen Debus of Region V, U.S., E.P.A., instructed Universal Die Casting, Inc. to classify the lagoons as SO2, storage tanks. As a result, we will begin recording daily inspections of the lagoons. Previously, daily inspections were made but not recorded. Effluent discharge from the filter press passes through lagoon #1, lagoon #2, and enter outfall #001 to the Saline river. That effluent is analyzed on a daily basis and recorded. Solid waste in the lagoon is F006 (wastewater treatment sludges from electroplating operations). Universal Die Casting, Inc. will begin monitoring that sludge on a routine basis by analysis.

If additional information or documentation is required, please advise. Thank you for the time extension to September 10, 1984 per our phone discussion on August 7, 1984.

Sincerely,

Raymond H. Gallatin

Plant Manager

Corporate Office/Saline Plant

аb

Enclosures

Mr. Bay Gallatin, Pasmt Manager Universal Die Casting 232 Hource Street Saline, MI 48176

Res MID 980795512

Dear Mr. Callatine

On July 31, 1984, staff of the Department of Natural Resources, acting as representatives of the United States Environmental Protection Agency, conducted an investigation of your facility located at Saline, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCEA), as amended. A copy of the inspection report is attached.

As a result of that investigation, staff of the Department have deterpined that the above facility appears to be in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

- The facility did not document all inspections and produce an inspection log as required in 60 CFR Part 265.15.
- 2. The facility did not document personnel training as requested in 40 CVR Part 255.16.
- 3. The facility did not document attempts to make arrangements with local authorities concerning an emergency as required in 40 CFR Part 265.37.
- 4. The facility did not have an up to date contingency plan as required in 40 CFR Part 265.52.
- 5. The facility did not have an estimate of closure costs nor did the facility have an organized operating record as required in 40 CFR Part 265.73.
- 6. The facility could not produce all records for inspection as required under 40 CFR Part 265.74.
- 7. The facility could not produce the groundwater sampling and analysis plan required under 40 CFR Part 265,92.
- 8. The facility could not produce an outline of a comprehensive groundwater quality assessment program required under 40 CFR Part 265.93.

August 14. 1922
Mr. Ray Calletin

9. The facility has not performed the statistical analysis required under 40 CFR part 265.93 c (b).

10. The facility did not produce a complete closure plan for the wasta treatment and storage lagoons as required in 40 CFR Part 265.112.

11. The facility did not produce logs or other documentation pertaining to the daily and waskly inspections of the lagoons required in 40 CFR Part 265.225 and 265.226.

I discussed these deficiencies with Mr. Murray, Technical Director, for this facility. It was apparent that this facility may be in compliance with many, if not all of these deficiencies. However, since Mr. Murray was newly assigned

I discussed these deficiencies with Mr. Murray, Technical Director, for this facility. It was apparent that this facility may be in compliance with many, if not all of these deficiencies. However, since Mr. Murray was newly assigned this area of responsibility he was unable to locate the records or documentation of compliance. Additionally as I discussed with both Mr. Murray and you this facility should better organize and coordinate all of the records so that compliance can be shown by your company. I or my staff are available to advise you regarding RCRA requirements and any other questions concerning this program.

We request that you respond to this letter by September 3, 1984 providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Robert E. Basch, Supervisor Lansing District 517-322-1300

RES/mt:

Inclosure

sc: Hazardous Waste Division U.S. EPA - Region V

126 10-18-84 Status 5 Hardet August 14, 1984 Mr. Ray Gallatin, Plant Manager Universal Die Casting 232 Monroe Street Saline, MI 48176

Re: MID 980795512

Dear Mr. Gallatin:

On July 31, 1984, staff of the Department of Natural Resources, acting as representatives of the United States Environmental Protection Agency, conducted an investigation of your facility located at Saline, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. A copy of the inspection report is attached.

As a result of that investigation, staff of the Department have determined that the above facility appears to be in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

- The facility did not document all inspections and produce an inspection log as required in 40 CFR Part 265.15.
- The facility did not document personnel training as requested in 40 CFR Part 265.16.
- The facility did not document attempts to make arrangements with local authorities concerning an emergency as required in 40 CFR Part 265.37.
- The facility did not have an up to date contingency plan as required in 40 CFR Part 265.52.
- The facility did not have an estimate of closure costs nor did the facility have an organized operating record as required in 40 CFR Part 265.73.
- The facility could not produce all records for inspection as required under 40 CFR Part 265.74.
 - The facility could not produce the groundwater sampling and analysis plan required under 40 CFR Part 265.92.
 - The facility could not produce an outline of a comprehensive groundwater quality assessment program required under 40 CFR Part 265.93.

rage Two August 14, 1984 Mr. Ray Gallatin

- 9. The facility has not performed the statistical analysis required under 40 CFR Part 265.93 c (b).
- 10. The facility did not produce a complete closure plan for the waste treatment and storage lagoons as required in 40 CFR Part 265.112.
- 11. The facility did not produce logs or other documentation pertaining to the daily and weekly inspections of the lagoons required in 40 CFR Part 265.225 and 265.226.

I discussed these deficiencies with Mr. Murray, Technical Director, for this facility. It was apparent that this facility may be in compliance with many, if not all of these deficiencies. However, since Mr. Murray was newly assigned this area of responsibility he was unable to locate the records or documentation of compliance. Additionally as I discussed with both Mr. Murray and you this facility should better organize and coordinate all of the records so that compliance can be shown by your company. I or my staff are available to advise you regarding RCRA requirements and any other questions concerning this program.

We request that you respond to this letter by September 3, 1984 providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Robert E. Basch, Supervisor

Lansing District 517-322-1300

REB/mj

Enclosure

cc: Hazardous Waste Division U.S. EPA - Region V

RCRA Inspection Report

EPA Identification Number: MID 98079	5512
Installation Name: "Universal Dro CASKins	
Location Address: 232 Monroe ST,	
City: Saline State: Mich	
Date of inspection: $\frac{7-31-84}{}$ Time of inspection (from)	11:00A (to)
Person(s) interviewed Title Ray GALLATIN Phyt Man	Telephone 3/3 - 429-94//
> Bob Murray Technion Dir	* * * * * * * * * * * * * * * * * * * *
Inspector(s). R. Basch Agency/Title Mour/WOS	Telephone 5/7-322-1360
Installation Activity (mark only one box)	<pre>Inspection Form(s)</pre>
Treatment/Storage/Disposal per 40 CFR 265.1 and/or- Generation and/or Transportation	A) 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4
Treatment/Storage/Disposal (no generation or Transportation)	A
☐ Generation and Transportation	B., C
☐ Generation only	В
Transportation only	С

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3310-3) Thisped	CCION FORM P	1 Section(3)
S01 <u> </u>		I
SO2 storage in tanks		J
TO1 III treatment in tanks		J
504 It storage in surface impoundment		K,F
TO2 IV treatment in surface impoundment		K,F
D83 disposal in surface impoundment		K,F
SO3 storage in waste pile		L
DBI disposal by land application.		M,F
D80 III disposal in landfill		N, F
TO3 treatment by incineration		O/P
TO4 treatment in devices other than tanks, impoundments, or incinerators	surface	Q
Other activities		
GENERATOR THE	APPENDIX	GN
TRANSPORTER TT	APPENDIX	TR

 Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

Nin

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

MET

		Section B: GENERAL FACILI	TY STA	NDARDS:	(Part	: 265 Subp	art B)	
			YES	NO	NI*	Remarks		
7.	Has bee	the Regional Administrator n notified regarding: 265.12						
	a.	Receipt of hazardous waste from a foreign source?				**************************************		
,	Ь.	Facility expansion?	<u> </u>	/	************************************	the second secon		ne Marie de Monardo mando, como propria por Maria de Maria de Maria de Mondre de Apresa de Mondre de Apresa de
	C =	Change of owner or operator?	Signature of the same of the s			المناسبة المراجعة المناسبة الم	distribution of a printer of the communication of the company of t	- Alberton - This sea the Black bloking agreement or allest the sea of the se
2.	Gen	eral Waste Analysis: 265.13						1
-	đ.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	-1/					•
	b.	Does the owner or operator have a detailed waste analysis plan on file at the facility?	: Mindynhopolokaldo			Do.	ent Lul	of and
	C.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	was market and the				<u> </u>	
3.	Sec	urity - Do security measures include (if applicable) 265.14						
	a.	24-Hour surveillance?		San France	· .			
	b.	<pre>or i. Artificial or natural barrier around facility?</pre>						
•		<pre>ii. Controlled entry?</pre>				State in Specific complete (1995) graph (Independent American company)	and the second s	о оборожно до обращения об оборожно до обращения до обращения до обращения до обращения до обращения до обраще
. •	Ç.	Danger sign(s) at entrance?	Sansa d'Al-Sansa de Balancia.					
4.	0wn	er or operator inspections: 265.15						
	ā.	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or	. Je					
		the environment?						,

<i>y</i>	b.	hav	es the owner we an inspect the facility	tion sche			P-1 tribute	1			- tend - tende mulphysys	
	C+.	the	so, does the inspection									
-12 Ans	:	1.	monitoring	equipmen	t?		STATE OF THE STATE	- Bookson	The state of the s	-		
		ii.	safety and	emergenc	y equipm	ent?	**************************************			· · · · · · · · · · · · · · · · · · ·		
	i	ii.	security de	evices?			· ·			· · · · · · · · · · · · · · · · · · ·		
		ív.	operating a ment (i.e.	ind struct dikes, p	tural equ umps, et	uip- c.)?		-	2 2			•
		٧.	type of profor during leaky fittiet.)?	the inspi	ection (e.g.	Phoedráneo		Standardon - Standardon			
		vi.	inspection the possibl of the equi	e deteri	y (based oration	upon rate	Azandrom van allina av sag	**************************************	Sampahangkhangkangga			
	d.	Are ed	areas subje daily when i	n use?	ills ins _l	pect-	- Chickenson of Specials					
	e.	an	s the owner inspection l er or operat	og or sur	nmary of	tain	Manufactures and	· Transconnection				
	f.	Doe fol	s the inspections of the second secon	tion log	contain	the						
		j.	the date ar	id time of	the ins	spection	?		****			
. 	i	ii.	the name of	the insp	ector?	An-		-				
	i	ii.	a notation made?	of the ol	servatio	ons	- Stationer appropri	***************************************		-		
·	ή	iv.	the date an repairs or			?	allenger-carriers.	بسبدرورستان بسبدرورستان		*****************		
. Do per includ			training rec 55.16	ords	- Wil	1 has	-645	L. L.	-			
27	a:	Job	titles?			-	alternative statement					· · · · · · · · · · · · · · · · · · ·
	b.	Job	description	s?				****	m ²⁰ † dell'pris succession a la se			
					£	2-2						

YES NO NI

Remarks

			140	110	11.1	(ACMOT K.2	
-	Ç.	Bescription of training?		-			
. ,	d.	Records of training?					
1	е.	Did facility personnel receive the required training by 5-19-81?				***************************************	
	f.	Do new personnel receive required training within six months?	Briddervicklynskip	generalization for the first f	Филопортивности		
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?					
õ.	req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.1	7			A	
	ā,	Special handling?		************	- Company - Company		kerren en varaket kindig er var en kan "alla k erren kind alle kan
	b.	No smoking signs?	Deres des Belles des de la constante de la c	#2/1200/#######	· gallingeringeringer	And construction to the second se	
	C•	Separation and protection from ignition sources?	Parameters	and the second second	- WTScourts-mile		

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

,],	Maintenance and Operation of Facility: 265.31	YES NO NI	Remarks	
	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		-	
2.	If required, does the facility have the following equipment: 265.32			
•	a. Internal communications or alarm systems?	ommente exemples		
	b. Telephone or 2-way radios at the scene of operations?			
	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?		MA- Plat	Study.
	Indicate the volume of water and/or foa	um available for fir	re control:	
3.	Testing and Maintenance of Emergency Equipment: 265.33			
	a. Has the owner or operator established testing and maintenance procedures for emergency equipment?		Sugatty a	in the second
(t)	b. Is emergency equipment maintained in operable condition?			
4.	Has owner or operator provided immediate access to internal alarms? (if needed) 265.34			
5.	Is there adequate aisle space for unobstructed movement?	alle til de amerikanse i svelk di riggigst m. de besty singssense i	<u> </u>	
- 6.	Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?			
	•			

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

- Does the Contingency Plan contain the following information: 265.52
 - a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

- Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

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up grades

Phys spens

N/A - 1950

Plate tente purel and and

at this facility, has the Emergency Coordinator followed the emergency

procedures listed in 265.56?

	•	-	Section E:	MANIFEST	SYSTEM,	RECOF	RDKEE	PING,	AND RE	PORTING:	(Part 2	265 Subpa	art E)
							YES	NO .	NI	Remark	5		
٦.	Use	of.	Manifest Sy	stem 2	65.71								
	a•	propro (Pal the	s the facil cedures list cessing each reticularly signed man erator with ivery.)	sted in §2 ch manifes sending a nifest bac	265.71 for st? a copy of ck to the				-		1/A		and an analysis of the superior
	b.		records of ained for 3		ipments				sumun d				
2.	req	uire	e owner or ments regai ancies?			·	Milingharmymoly		hard-mountain state,		1/4		· ·
of rec	on-s eive	ite any	ble to owner facilities waste from	that do no off-site	not								•
	a.	mai rec	s the owner ntain an op ord as requ .73?	perating	ator				en e	· ·			·
	b.	con	s the operation the formation:		ord								
		i.	The method of each was storage, of required Appendix	iste's tro or disposi in 40 CER	eatment, al as		No and	on quantity and the					militaren hamar yanzaria yanzaria yanzaria esperi
		îî.	The locateach hazar facility? should be to specifif waste when the short of the sho	rdous was (This i cross-re ic manife was accom	te within nformation ferenced st number,	the 1							

***iii. A map or diagram of each cell or disposal area

N/A -met disposal

^{***} only applies to disposal facilities

iv.

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

		•	YES	NO	NI	Rema	rks	
· .	facili	e owner or operator of the ty implemented a ground-monitoring system? 265.90	1					
	If "no	", Skip to number 11.		-				
2.	facili ground	e owner or operator of the ty implemented an alternate water monitoring system as ped in 265.90(d)?	Standardaganga	1	**************************************			
	If "yes	s", skip to number 12. ", continue		į.				
3.	system	ne groundwater monitoring meet the following re- ents of 265.91:						
	hyo the	least one well installed draulically up-gradient from e limit of the waste manage- nt area?		Marinage,	*francos»	*	1	
	Inc up-	licate the total number of gradient wells.						
	hyc the	least three wells installed Iraulically down-gradient at Ilimit of the waste manage- nt area?	Ludden					
		licate the total number of ungradient wells.	Princes (assertations)	Section States	Name of State Stat			APAS (imme majamaminun) planes de representação de consentações de consentaçõe
	dep to	the number, locations, and ths of all wells sufficient yield groundwater samples		Bergeral				

groundwater under the facility?

Sketch the locations of the wells relative to the waste management area.



d. Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?

YES NO

NI

4. Has the owner or operator developed a written ground-water sampling and analysis plan that includes procedures and techniques for: 265.92

a. Sample collection?

b. Sample preservation and shipment?

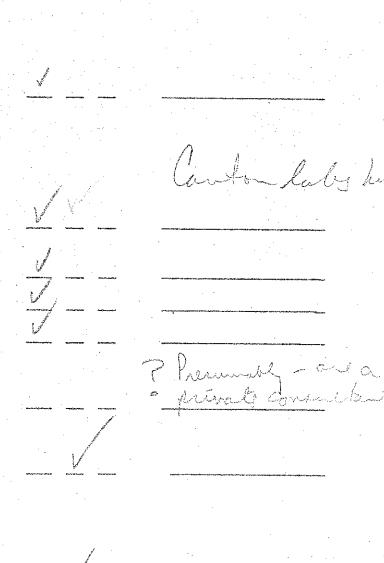
c. Analytical procedures?

d. Chain of custody control?

5. Does the owner or operator follow his groundwater sampling and analysis plan?

From the foundwater sampling and analysis plan maintained at the facility?

7. Has the owner or operator determined the concentration or value of all the groundwater monitoring parameters of 265.92(b) in accordance with paragraphs c and d of 265.92?



Remarks

- demonstration for the facility?
 - Is the waiver demonstration maintained at the facility?
 - Has the waiver demonstration been certified by a qualified geologist or geotechnical enginear?

Inspectors should request a copy of the waiver document.

Skip questions 12, 13, and 14.

^{*}These requirements do not take effect until the first 6 months after November 19.1982. The latest date for compliance with these requirements is May 19, 1983.

12. Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?

a. Has the plan been certified by a qualified geologist or geotechnical engineer?

Note: If the plan for an alternate groundwater monitoring system was not submitted to the Regional Administrator the inspector should request a copy for review.

- 13. Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?
- 14. Does the owner or operator submit reports and maintain records as required in 265.94?

Section G -OSURE AND POST CLOSURE (Part ? Subpart G) YES NO NI Remarks 1. Closure 265.112 Is the facility closure plan available for inspection? Does the plan identify: maximum extent unclosed during facility life? maximum hazardous waste inventory? 10. estimated year of closure? schedule of closure activities? Has closure begun? *2. Post-Closure 255.118 a. Is the post-closure plan available for inspection? Does this plan contain: description of groundwater monitoring activities and frequencies? description of maintenance ii. activities and frequencies for AA. integrity of cap, final cover, or containment structures, where applicable facility monitoring equipiii. name, address, and phone number of person or office to contact during post-closure care period? Has the post-closure period begun?

*Applies only to disposal facilities.

estimate available?

d. Is the written post-closure cost

265.144

Section I - USE AND MANGEMENT OF CONTAINERS (Pa. 265, Subpart I)

		YES NO NI	Remarks /
	Are containers in good condition? 265.171	Schaudingfortig. Strengthistig. Strengthistig.	BANK THE
2.	Are containers compatible with waste in them? 265.172		
3.	Are containers managed to prevent leaks? 265.173 Are containers stored closed?		
	Are containers inspected weekly for leaks and defects.	Bankhaya Planda. Bankhankada. vencenggapang	
5.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.176	
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	Annangarion surrannos	
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?		

*	tion	J	TANKS	(Part	265.	Subp	:	J

MA

YES NO NI Remarks

1.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192							
2.	Do uncovered tanks have at least 60 cm (2 feet) of free- board, or dikes or other con- tainment structures?					The state of the s		
3.	Do continuous feed systems have a waste-feed cutoff?	Carl Andrews Const.	in the spingerings	(Padestant) de la calenca aporter	***************************************	The course of the same of the course of the	and the state of t	· · · · · · · · · · · · · · · · · · ·
4,	Are waste analyses done before the tanks are used to store a substantially different waste than before?	265.193	- Contractive	***************************************			an a	
5.	Are required daily and weekly inspections done? 265.194						T of the control of t	
6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	.198						
7.	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)	Vandishymungs	termatikal firegasis	Orectamorphisms	One of the hallower gags.	erenden erenden erenden	galle-gallerya (di Sarrighton) arisyan majay	atir kiri Çeşillek sağırmı
8 .	Has the owner or operator observed the buffer zone requirements for tanks con	National	Fire	Prote	ction A reacti	ssociat ve wast	ions es?	er todur in europe
	Tank capacity:gallons	and the second s						
	Tank diameter:feet	art N						ē
	Distance of tank from property line				fee	t		
	(See table 2 - 1 through 2 - 6 of N Code - 1977" to determine complianc	FPA's "FI					iquids	

		Section K ·	URFACE IMPO	UNDMENTS	(Par	t 265	, bpart K)		
••• •	at lea	face impoundments st 60 cm (2 feet) ard? 265.222		YES	NO .	NI	Remarks		
. 2	2. Do ear covers	then dikes have p ? 265.223	rotective	-	Mayl (Newskillenskie	##P> I revisatorise#	***************************************		
3	impoun substa	ste analyses done dment is used to ntially different efore? 265.225	store a	depole to service pass	- - -	Morneyansk sypposylly	And the second s	Loft, c	ka-
> 4		freeboard level st daily? 265.226		A	Mininga dan sajang	Wilderson State of the State of			eAchter#10f@delanguage.pup
5	for ev	e dikes inspected idence of leaks o oration?		10 ^d		~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~		d Logi	
6	render ignita surfac waste or non	active & ignitabled non-reactive oble before storage impoundment? (is rendered non-reignitable, see tements.) 265.229	r non- e in a If eactive						
. 7	in dif not, t	compatible wastes ferent impoundmen he provisions of (b) apply.) 265.2	ts? (If 40 CFR	, distributor empleto const	De Producentos	мо-томуудага	N/A		engumented (I) (see

Section L - WASTE PILES (40 CFR Part 265, Subpart L)

		YES	1 ON	¥.	Remarks
٦.	Are waste piles covered or protect from dispersal by wind? 265.251	:ed 	Transcara es		
2.	Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	- Arthur	TOTAL TOTAL STATE OF THE STATE		
3.	Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253				
4 .	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256				
5,	Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	P sprawney, ser	- Santana - Sant	TO THE PARTY OF TH	
5.	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257	protection con-	Partitohis vasquiyy	normal desputes and	
7.	Are piles of incompatible waste protected by barriers or distance				

Saction	M	_	LAND	TREATMENT	(Part	265	Subnart	MI	
25Cf (01)	[*]	-	LMNU	IKEMINEMI	trait	200	Support	1.7	

MA

		YES	NO	NI	Remar	ks		
1.	Is treated hazardous waste capable of biological or chemical degradation? 265.272		an and an analysis of the second					
2.	Are run-off and run-on diverted from the facility or collected							
3.	Is waste analyzed according to 265.273?	Address of the	فلفقت بإسمون			·	ogo, ggop, am maggir sam til med til del figlighet til mil me	international Careful States (See printers and manages become sign
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	Chiminal construction	agestation of Standards	Securedality				and the second s
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278			an manus ni kandina	amakana Aman			
6.	Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	will the grant of the second	Approximate and the second	p growing who are				and the second s
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279	***************************************	Section and the section of the secti	on the state of th	dissiplication of security		al angular de la constitución de l	
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281	all man of the first section and the first s	ga g ruspandssma		guint Tigan le litte e religione	erangana na amiyana na mahandigan da karifikka sa	ngangangan kasal Palambar Palambar - Palambar	yaand kushaassa ka
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282							

Section N - LANDFILLS (Part 265, Lupart N)

YES NO

General Operating Requirements Does the facility provide the following: Diversion of run-on away from active portions of the fill? Collection of run-off from active portions of the fill? C. Is collected run off treated? Control of wind dispersal of hazardous waste? Surveying and Recordkeeping Does the Operating Record Include: A map showing the exact location and dimensions of each cell? The contents of each cell and the location of each hazardous waste type withing each cell? Special requirements for ignitable or reactive waste. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or re-

active? (Indicate if waste is ignitable or reactive.) 265.312 Special Requirements for Incompatible

Wastes. 255.313

Does the owner or operator dispose of incompatible waste in separate cells? (If not, the provisions of 40 CFR 265.17(b) apply.)

If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

- 5. Special requirements for liquid waste
 - a. Are bulk or non-containerized liquids placed in the landfill? If "yes," complete items i, ii, and iii.
 - i. Does the landfill have a chemically and physically resistant liner system?
 - ii. Does the landfill have a functional leachate collection system?
 - iii. Are free liquids stabilized prior to or immediately after placement in the landfill?
 - b. Have containers holding free liquids been placed in landfill since March 22, 1982?
- 6. Special requirements for Containers
 Are empty containers crushed flat, 265.315
 shredded, or similarly reduced in volume
 before being buried beneath the surface
 of the landfill?

	^				τ σ	CE 282 T	0er 0=0	
þ.	LOM	ponents and s	teady state	e conditi	on: 1 4	165.343 T	265.373	
	Was	each compone	nt at stead	ly state	prior to	adding was	te?	
		Compon	ent		YES N	IO NI	Remarks	
		orderfordelisten medianis summerine menengapapa sa sperimente menen			erretanisi mm apa	Panno Kapaight		- The state of the
			man en		WWW.Charabekh-referen gerag	Addition of Property Control		
				Nidari (-1)-saintynyssaagugu	Veneralization (to	Martiner bergefrige	Man Annual manual or appropriation for making up to specify the Completion or annual many.	э На (менун түүн түүн байма байм
-				oran in the later of the later	MATERIAL STATE OF THE STATE OF			
Was a.	Min	nalysis imum requirem previously b	I 265.349 ents, for w urned/treat	astes	265.375		ę.	
	j	Required ana analysis bee the followin	n performed					
		Heating valu			ورمة نوبعة بين		and the second s	n dingan kananda a menjamangangan salah dinang berkempan menjah dingan kananda pertengan pertengan dingan dan dinanggan
		Halogen conti	ent		Оунфинатунали — Дэнц	Service Services	And the state of t	ari ngalapha at ga masalahan dalam binggalapan ga paka dalam da manayay in salah masalah masalah anga at anga Tanga lapha at ga masalah na dalam binggalapan ga paka dalam da manayay in salah masalah masalah anga at anga a
		Sulfur conte	nt		TOWN MEDICAL M	natura 1904). Apaticulas (1914)	The first state of the state of	
	î î.		ed or writt	en data alysis	marananan. waka	omore galasis		METER AT FE SATION WITH BUILDING A CHEMICAL MATERIAL AND

WA

	List other paramters for which the waste establish steady state or determine the (Note in Remarks any which you feel shou	types	of po	llutan	ts which may be emitted.
		YES	NO	NI	Remarks
3. <u>Mon</u>	itoring and Inspections I 265.347	I ()	NO .	11.7	Kenia i K 5
	T 255.37				
đ.	Are combustion/emission control instruments monitored at least every 15 minutes?	· ·	20-11-1-10-1-10-10-10-10-10-10-10-10-10-1		
b.	Is steady state maintained or corrections attempted?	dermite serving demo-	e-3ranjihnjak	Service Paris	
Ċ.	Is stack plume observed at least hourly for normal color and opacity?		gar-manufig		
d.	Did any stack observations made by owner or operator show a plume different than normal?**		Materials (Monte)**	Mad Provide over for	
e.	If "yes" to (d) above, were corrections made to return emissions to normal appearance?**	turcovecture	Spiror to State length		
.	Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?				
		-			
**Spe thi	cify in Remarks for what period of time s was checked.				
a.	Are emergency shutdown controls and	-			
5 *	system alarms checked daily for proper operation?		• ••••	- Act Color Command The	
l. <u>Ope</u>	n Burning T 265.382 (open burning does no	t app	ly to	incine	ration)
a.	Only complete this part if the facility open burns hazardous waste.		. •		
	i. Does this facility burn only waste explosives? (A No answer means other hazardous				
	waste is open-burned).		Of Carefornia and	- Contraction of the Contraction	ATTENDED TO A STANDARD AND A STANDAR

ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)

•	the state of the s	
Pounds of waste explosives or propellants	Minimum distan burning or det property of	onation to the
0 to 100	204 m 380 m 530 m 690 m	670 ft 1,250 ft 1,730 ft 2,260 ft

 Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

		And the second s	YES	NO	NI	Remai	ks		
(1)		s the operator have copies of the manifest ilable for review? 252.40	- Japan Marie Company		more for samp or transact)				
(2)	mon.	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.	6						
(3)	fol cop fes	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manitis) that do not contain the critical ments). 262.21		o de la companya de					
	a.	Manifest document number?	Executive .	virusiyar-ba					in annu viene en
•	b.	Name, mailing address, telephone number, and EPA ID number of Generator		/ 	· ·				
	C.	Name and EPA ID Number of Transporter(s)?		tomate and the		· · · · · · · · · · · · · · · · · · ·		Northwest (No. 1888) for the sec	· · · · · · · · · · · · · · · · · · ·
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	grander and state of	girl yerr			www.co.wooderdeen		
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	Jana de la companya d		and the sold of the sound	a-millan autorischen Vergebringsber			
	ŕ.	The total quantity of waste(s) and the type and number of containers loaded?	3 0				· · · · · · · · · · · · · · · · · · ·		
	g.	Required certification?	- 	/		<u> </u>	erren broken id vog u 1807 diker de	ndjarliik vakklis kaalkassa.	
	h.	Required signatures?	9 (m) 1977.						
(4)	Rep	ortable exceptions 262.42							
	â.	For manifests examined in (2) (except for enter the number of manifests for which the signed copy from the designated facility whent.	he genê	erato	~ has j	<u>40T</u> re	ceive	ed a	
-	b.	For manifests indicated in (4a), enter the has submitted exception reports (40 CFR 26 tor.	e numbe 5 2. 42)	er for	r whic ne Reg	h the ional	gene Admir	rator Nistr	- G

Sect	ion	C: PRE-TRANSPORT REQUIREMENTS (Part 262,	Subpari	t C)		~ .		•	•
1.	with (Rec	vaste packaged in accordance n DOT regulations? nuired prior to movement of ardous waste off-site) 262.30	YES	S N	0 N.		Remarks	· · · · · · · · · · · · · · · · · · ·	
2.	in a cond (Red	waste packages marked and labeled accordance with DOT regulations cerning hazardous waste materials? quired for movement of hazardous te off-site) 262.31 262.32	· ·	/	weddiddig Pro				
3.		required, are placards available to asporters of hazardous waste? 252.33	<u>.</u>		magangkapangkip (dan Amad	enantitive saletime.	g an Paraga a anni an ag Paraga, ann de gag a ann ag an gàra an ann air de	And the Aller of the Control of the	төөлдөгт шагуудагандаганда газан хого доходогой дагандаганд
4	was with and to	site accumulation of generated hazardous we te it generates either (A) in its storage of 40 CFR 262.34 [see 265.1(c)(7)]. Option containers. If the installation elects of Section D. If the installation elects opt ons: See 40 CFR 262.34 January 11, 1982 R	facilit B rest option A ion B,	y [2 rict , ch comp	65.1(s all leck t	b)] o accu his b	r (B) in mulation ox [] an	accor to ta d ski	dance nks p
	ā∙	Is each container clearly marked with the start of accumulation date?	e. Berlikens	Market and the second	·				
	b.	Have more than 90 days elapsed since the date inspected in (a)?	enachas	racino en	- مازونسپردسونال	No	- Control of the Cont		
	C »	Do wastes remain in accumulation tanks for more than 90 days?		ngramijo soc	-	•			
•	d.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?		eternanets and	many napanggapang span			·	
Se(Are nea	D: - RECORDKEEPING AND REPORTING (Part 26 all test results and analyses eded for hazardous waste determations retained for at least	-		D) NO	NI	Remark:	•	
	thr	ree years? 262.40	Suhnart	E)				<u> </u>	en de la composition della com
<u>380</u>	.Has	s E: - INTERNATIONAL SHIPMENTS (Part 262, 1 s the installation imported or ported Hazardous Waste? 262.50	·	- J	1			· ·	
		f answered Yes, complete the following applicable.)						-	
	a,	Exporting Hazardous waste; has a generator:							

UNIVERSAL DIE CASTING, INC. 232 Monroe St. Saline, MI 48176

SPILL PREVENTION AND CONTINGENCY PLAN

1984

HOT LINE

Saline Fire Dept.	911
Saline Police Dept.	911
Saline Community Hospital	429-5435
Environmental Waste Control	357-5680
HIV 22 Ottmorrous Wasan and a second	561-1400
Saline DPW	429-4907 #244

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. -Details of Containment Drawings

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APPENDICES - HAZARDOUS SUBSTANCES

-Hazardous Wastes

-Hazardous Substance - Reportable Quantities

ENVIRONMENTAL EMERGENCY PROCEDURES

Emergency Coordinator's Response to an On-Site Emergency

- 1. Assess type of emergency and determine whether personnel or environmental hazard exists. Such hazard exists if the answer to any of the following questions is yes:
 - A. Is there a fire that is, or could be (if not expeditiously brought under control), a threat to human health or the environment?
 - B. Are corrosive vapors being generated that could be a threat to human health or the environment?
 - C. Is there or could there be (as a result of A or B above) a spill that would be a threat to human health or the environment? (See Appendices A and B.)
- 2. If no personnel or environmental hazard exists, take normal housekeeping control and clean up action.
- 3. If a personnel or environmental hazard does exist:
 - A. Alert all personnel to avoid or evacuate the hazard area.
 - B. Notify the in-plant response team to control hazard (see p. II-2) as follows:
 - 1) Fire
 - a. Combustible toxic oil (will support flame)
 - (1) Use A.B.C. fire extinguishers.
 - (2) Use dirt, sand, gravel to smother flames.
 - (3) Do Not use water.
 - b. Toluene transfer valves (extremely flammable)
 - (1) Use A.B.C. fire extinguishers.
 - (2) Shut off feed valve located at mix tank.
 - (3) Do Not use water.
 - 2) Spill (Spill equipment located in storage building see site plan)
 - a. Combustible toxic oil (if it escapes diked containment area)
 - (1) Prevent its flow into sewers or off site by using diversion or absorbant methods.
 - (2) Keep from open flame.
 - (3) Do not ingest.
 - (4) Once contained, use "oil dry," cloths, or any oil absorbing material to solidify oil. Place in adequate container for dispostion.
 - b. Corrosive chemicals (liquid and vapors cause extreme burns)
 - (1) Wear acid protection equipment (gloves, face shields, boots, respirator, etc.) before contacting substance or its vapors.
 - (2) Contain with lime, oil dry, or other dry, neutral substance.

(3) Place dried, absorbed substance in a container that is corrosion resistant (neutralize with lime if possible).

(4) Dispose of properly.

Flammable toluene (keep away from sparks or flame)

(1) Contain with dry, absorbant material.

(2) Dispose of properly.

- 3) Corrosive Vapors (causes extreme burns on contact)
 - Wear acid protection equipment (gloves, face shield, respirator, boots, etc.).
 - Contain with lime, oil dry, or neutral substance.
 - Once dried and neutralized, place in corrosion-resistant container for disposal.

4. If outside help is needed:

A. Notify respective agency:

Agency	Telephone
Saline Fire Department	373-3473
Saline Police Department	283-4357
Saline Community Hospital	283-7425
Environmental Waste Control	404-622-8712
Saline DPW	313-429-4907,#244
R Idontify to some	

- B. Identify to agency:
 - 1) Character of substance involved (toxic, flammable, etc.)
 - 2) Source (leaking tank, hose, etc.)3) Amount (one gallon, 500 gallons)

 - 4) Real extent of release (in confined area, in river)
 - 5) Your assessment of hazard and possible complications
- Take control measures to minimize incident and prevent spread (shut down operation, system, etc.).
- Monitor event for additive or extraneous hazards.
- Arrange for treat, transport, and disposal of hazardous residues.
- Avoid incompatible or cross contamination exposure of hazardous residues.
- 9. Restore and replace emergency equipment to proper operating order and location.
- 10. Record event. Include time, date, and details.

OFF-SITE ENVIRONMENTAL EMERGENCY PROCEDURES

Emergency Coordinator's Response to an Off-Site Emergency

- 1. Do as Items 1 through 5 on pages I-1 and I-2 require.
- 2. If human health or the environment is threatened outside of the facility:
 - A. If required (see note below), report to:

Michigan Department of Natural Resources Pollution Emergency

Universal Die Casting, Inc.

1-800-292-4706

Robert Murray

Office: (313) 429-9411 Home: (313) 772-5105

the following information:

- 1) Your name and telephone number;
- 2) Facility name and address;
- 3) Time and type (fire, spill) of incident;
- 4) Name and quantity of material;
- 5) Injuries;
- 6) Possible hazards outside of the facility.

NOTE: Only a release, fire, or explosion which could threaten human health or the environment outside the facility must be reported as above.

Example: A release of toxic substance onto adjoining

ground that is controlled and being cleaned up properly would not require notification.

Example: A release of toxic substance that is not under

control and is proceeding toward a water supply

would require notification.

- B. Within 15 days, file a report to the Regional E.P.A. administrator as follows:
 - 1) Name, address, and telephone number of the owner or operator;
 - 2) Name, address, and telephone number of the facility;
 - 3) Date, time, and type of incident (e.g., fire, explosion);
 - 4) Name and quantity of material(s) involved;
 - 5) The extent of injuries, if any;

- 6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- 7) Estimated quantity and dispostion of recovered material that resulted from the incident.
- 3. Do as Items 6 through 10 on page I-2 require.

EMERGENCY PERSONNEL AND EQUIPMENT

Emergency Coordinators

	Name	Home Address	Home Phone	Office Phone
1.	Ray Gallatin	2856 Rodesiler Hwy. Deerfield, MI 49238	517-447-3240	313-492-9411
2.	Bill Powers	3362 Gove Court Tecumseh, MI 49286	517-423-5838	313-492-9411
3.	Robert Murray	517 N. Evans Road Tecumseh, MI 49286	313-772-5105	313-429-9411

Robert J. Murray, Technical Director, is assigned the overall responsibility of spill prevention and reporting.

Outside Pollution Control Assistance

Environmental Waste Control, Inc. 24901 Northwestern Hwy.	Carl W. Hornby Vice-President	313-357-5680
24901 NOICHWESCEIN Hwy.	· —	
Southfield, Michigan 48175		

Security

This facility normally operates three shifts over a period of 24 hours, five days per week. Full access is restricted to authorized employees only. Control areas subject to tampering are restricted by locked fences, locked valves, or other devices where applicable. During off hours, facility is patrolled by:

State Security 1000 Cornwell Place Ann Arbor, MI 313-848-6965

Emergency Response Crew

Name	Work Location Phone	Home Phone
Carl Wagner	313-429-9411 #234	517-423-2803
Tom Bennett	313-429-9411 #221	313-429-7768
Neil Lindemann	313-429-9411 #221	313-429-7685
Bill Marcum	313-429-9411 #266	313-482-5169

On-Site Emergency Equipment

- 1. 101 Fire Extinguishers in general manufacturing areas (See Site Plan)
- 2. Communication is internal and external telephone.
- 3. Water for putting out Class "A" fires located at perimeter of manufacturing and storage building (See Site Plan).

- 4. Spill control equipment located in storage building (See Site Plan).
 - A. Squeegees, mops, shovels, bags of oil dry, rags, lights, and acid-proof gloves, boots, face shields, and respirators.
- 5. Alarm system is electric bell and voice.

Hazards on Site

- A. Combustible liquid propane tank of 30,000 gallon total volume (See Site Plant #1).
- B. Toxic, corrosive chemicals in drums and tanks (See Site Plan #1-2). (Causes extreme burns on contact.)
 - a. cyanides, acids, alkali (sodium cyanide, sulfuric, caustic soda)
- C. Flammable material in tanks (See Site Plan #1-2).
 - a. solvents (toulene, acetone)

Notification

A copy of these contingency plans has been sent to the following agencies via certified mail:

- 1. Saline Police Department 7605 N. Maple Road Saline, MI 48176
- 2. Saline Fire Department East Michigan Avenue Saline, MI 48176
- 3. Saline Community Hospital 400 W. Russell Saline, MI 48176
- 4. Environmental Waste Control Inc. 24901 Northwestern Hwy. Southfield, MI 48075
- 5. DNR
 Hazardous Waste Division
 Lansing, MI 48909
- 6. U.S. EPA Region V
 Hazardous Waste Division
 RCRA Activities
 P.O. Box 7861
 Chicago, IL 60680

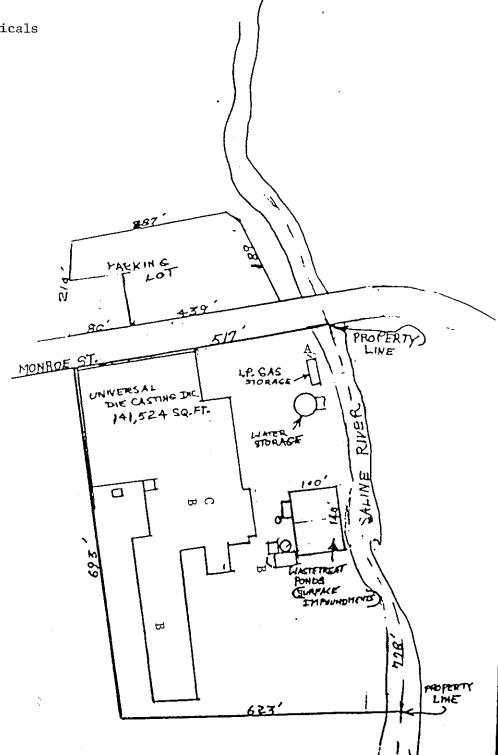
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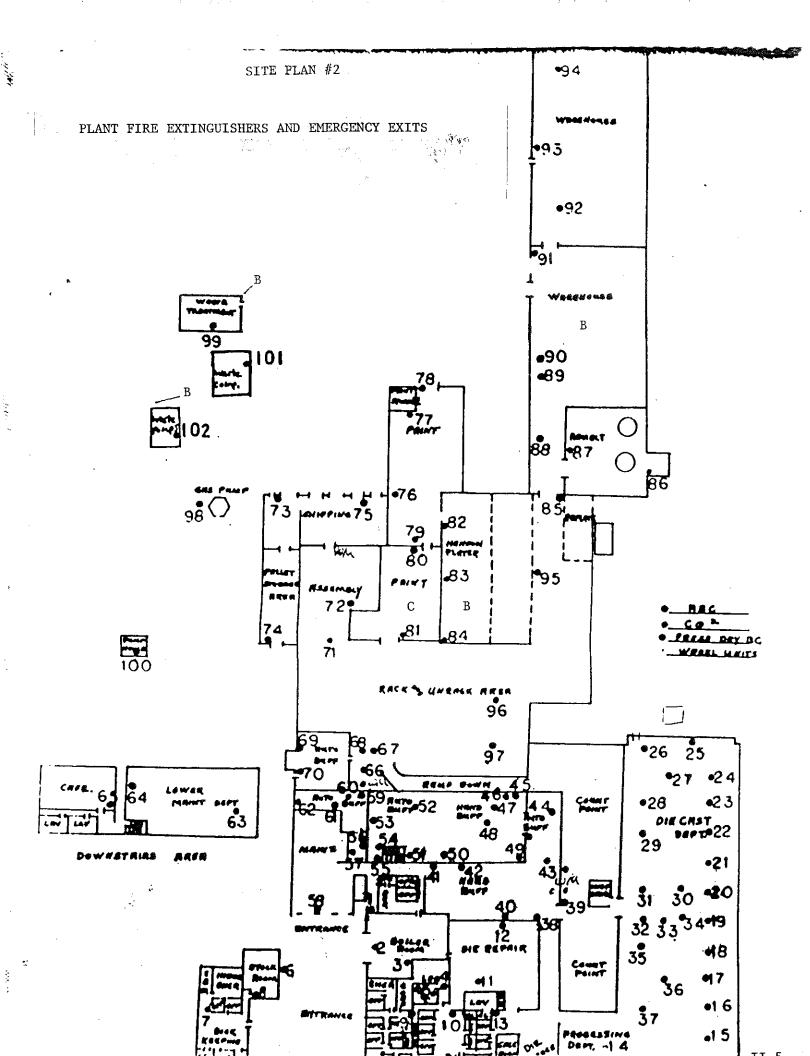
A = Liquid Propane Tank

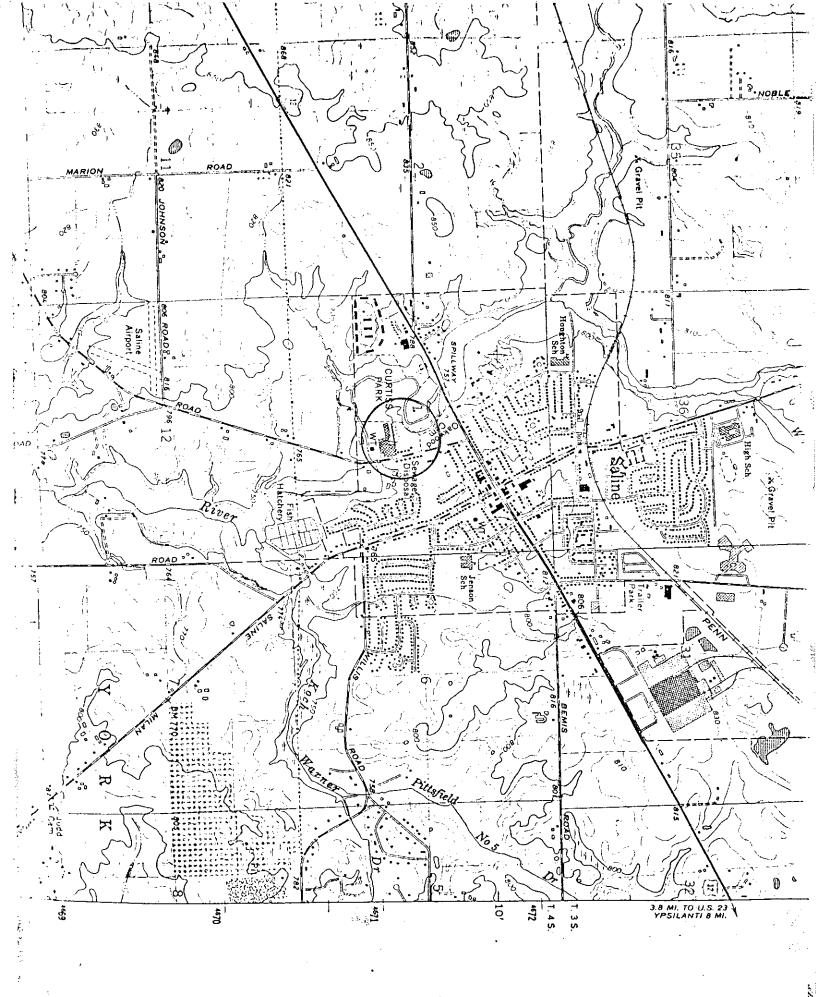
 \dot{B} = Toxic, Corrosive Chemicals

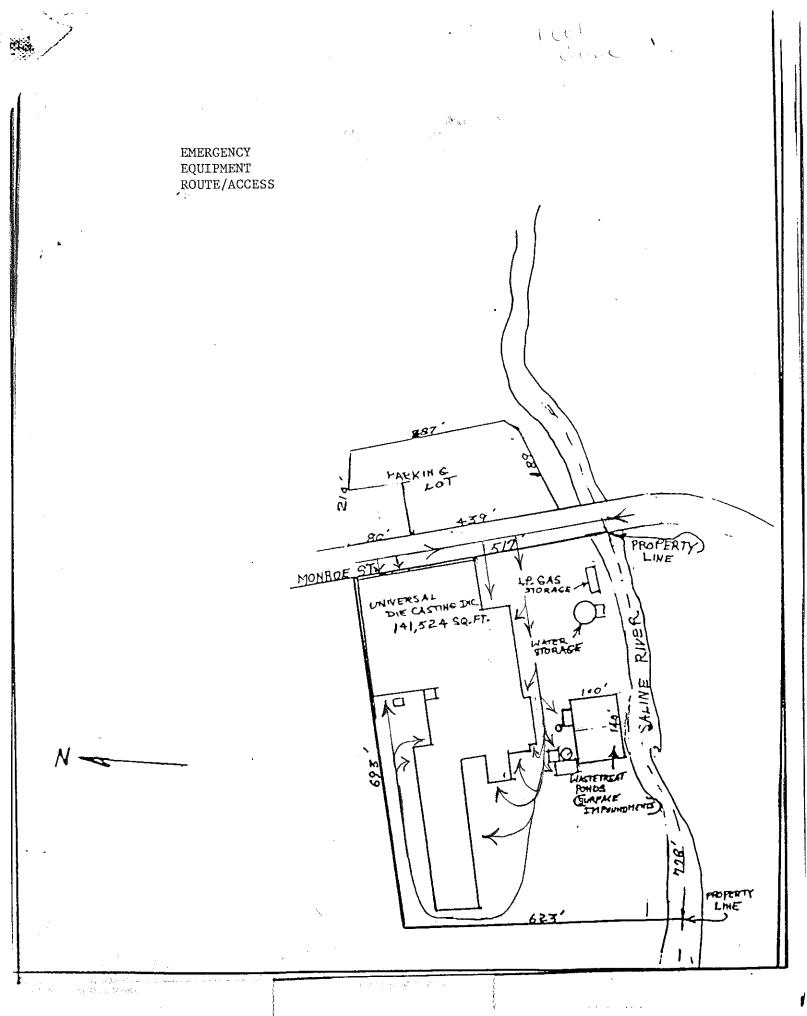
C = Flammable Materials

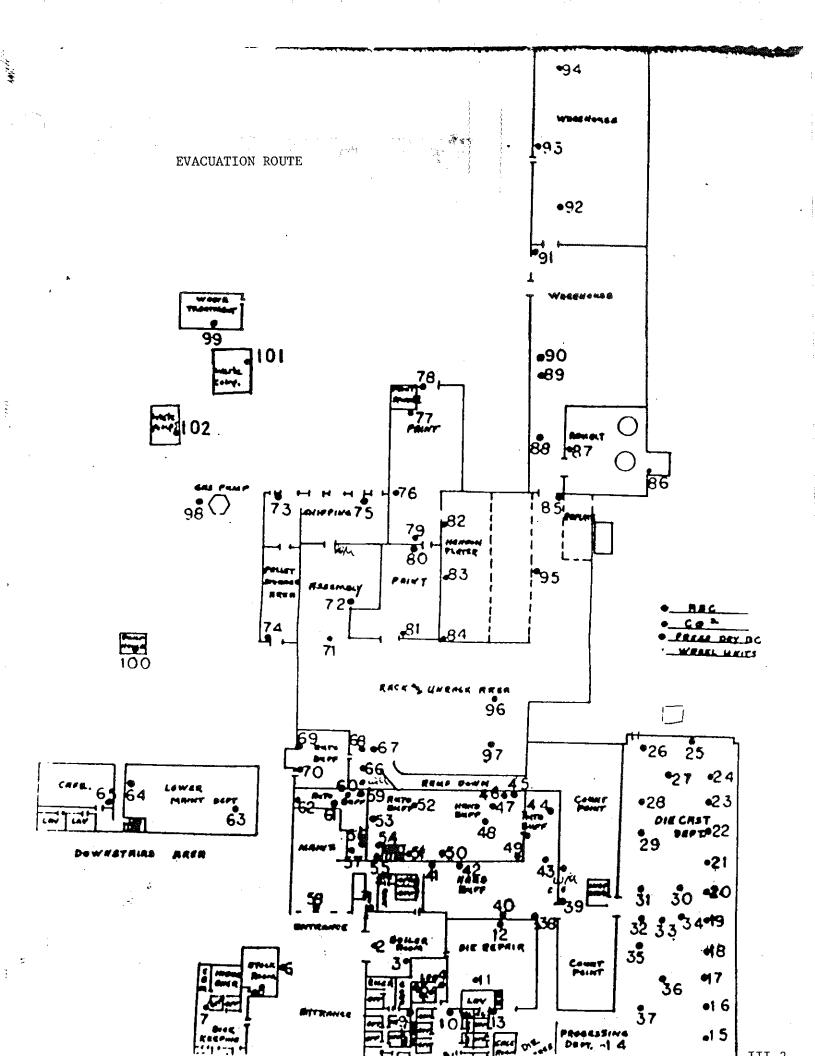
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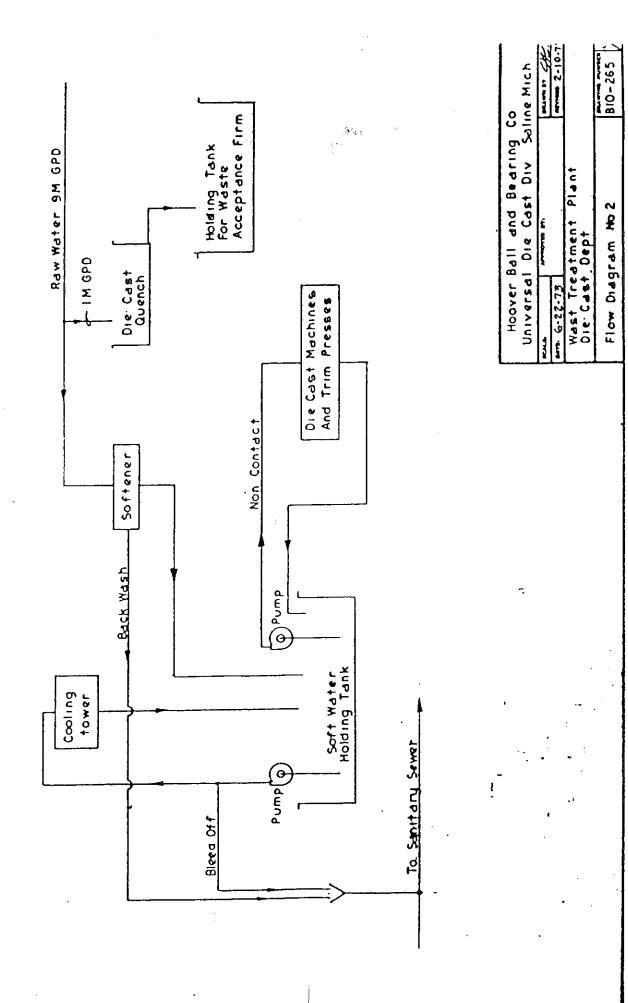










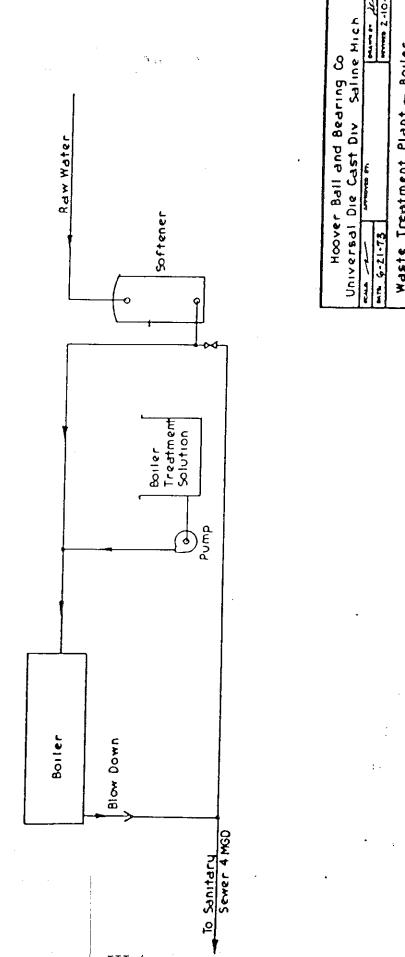


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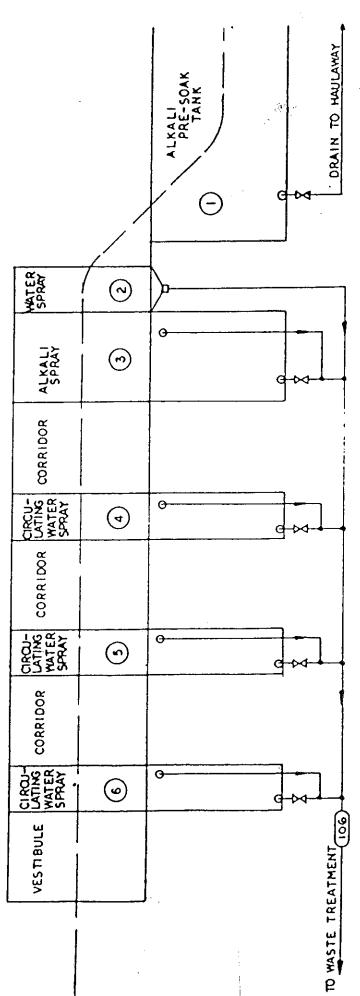
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810 265 Waste Treatment Plant - Boiler Flow Diagram No 3

III-4

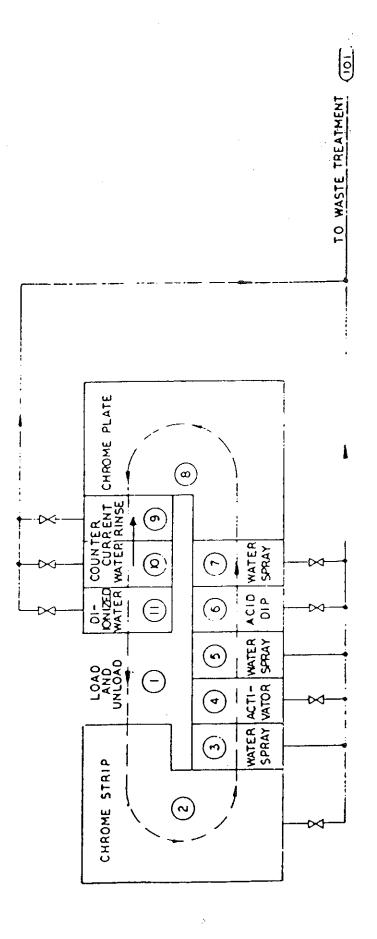


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\$ - **1**

UNIVERSAL DIE CAST DIV.	Saline, Michigan	The second of th	2-10 across 2-10	WASTE TREATMENT	5 STAGE POWER WASHER AND PRE-SOAK	PROCESS: DIAGRAM' NO 4 BIO-26
		Rena 1	2- June	WAST	5 STA	PROC

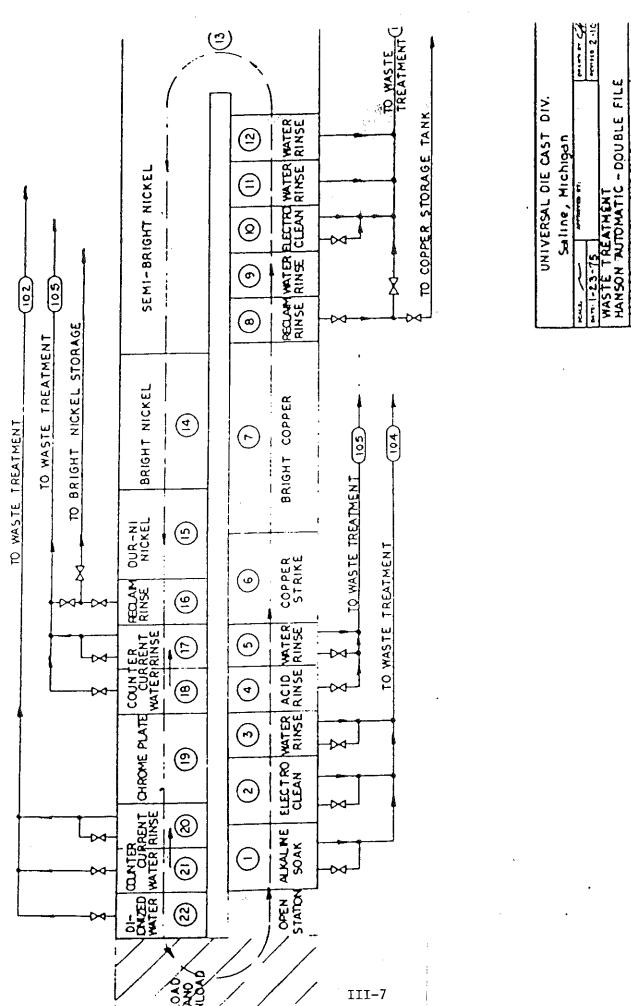
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Saline Michaeln

Keite _______

WASTE TREATMENT
UDYLITE AUTOMATIC-SINGLE FILE
OHROWE STRIP AND REPLATE
PROCESS DIAGRAM NO 5
BIO-26



810-265

egg:

INSPECTION PROCEDURES

- 1. At least weekly, inspections must be performed by an emergency coordinator or his designee.
- Inspector must maintain and sign inspection log following each inspection.
- Must inspect for:
 - A. Leaks:
 - B. Emergency equipment integrity (alarms, fire extinguishers, etc.);
 - C. Containment structure integrity;
 - D. Potential mechanical or operational failures;
 - E. Evidence of damage or physical weakness that may create, allow, or contribute to a spill;
 - F. Proper storage practices;
 - Spills in loading or unloading areas.,
- 4. Any irregularities, repairs, or violations related to spills or equipment must be logged.
- 5. Log must be kept with this plan.

INSPECTION SCHEDULE - ONCE/WEEKLY (To be filled out and returned to lab.)

	1)	Inspect chrome and cyanide transfer pumps for leaks or overheating
		motors.
		Problems:
		·
	2)	Inspect clarifier (valves, mixers, motors and probes).
		Problems:
	3)	Treatment Tanks (condition - operating manuals)
		Problems:
		•
	4)	Monitoring Equipment (pH meters, flow meters and recording meters)
		Problems:

Inspection Schedule - ONCE/WEEKLY (To be filled out and returned to lab.)

_ 5)	Chrome-cyanide-nickel discharge pumps (leaks, motor temperatur Problems:
	Problems:
_ 6)	Electrical Equipment (circuit breakers, overloads) Problems:
_ 7)	Sulfuric Acid, Caustic Soda, Hypochloride, Polymer Tank Cleaner
	Condition Problems:
_ 8)	Spills or any condition that is out of the ordinary.
	Problems:
9)	Filter Press (pumps, motors, leaks) Problems:

WASTE TREATHENT JOB BREAKDOWN

	Job Description/Daily		Remarks
1)	Take sample from Sampler - to lab.	Communicate Commun	
2)	Take grab sample from discharge pipe - to lab.		
3)	Take sample from ditch - to lab.		
4)	Read flow meter - to lab.		
5)	Check hypochlorite pump back of building		
	a) Run in extra hypochlorite if necessary.		
6)	Mix up treatment solutions.		
	a) Lime		
	b) Caustic Soda		
	c) Pura floc		
7)	Clean up chemical bldgs.		
8)	Treat cyanide tank, take sample to lab.		
	 a) If fails test, more treat- ment. 		
	b) If passes, pump out.	<u></u>	
	c) Resample		
9)	Treat chrome tank - take sample to lab.		
	a) If falls test, more treat- ment.		
	b) if passes, pump out.		
10)	Take grab sample of sludge to lab.		
11)	Record number of cyanide and chrome tanks treated each day.		

	Job Description/Daily	· % .	Remarks
12)	Record Number of blowdowns on clarifier each day.		
13)	Pump Plater pit.		
14)	Meter copper reduction mixture to cyanide treatment tank.		
	Monday-Wednesday-Friday		
1)	Clean Sampler		
2)	Clean and standardize pH meters (4).		
3)	Pump shed back of building W. Only.		
4)	Pump sump back of replate W. Only.		
	Miscellaneous		
1)	Clean lime valve.		
2)	Clean sludge pump pit.		
3)	Clean flow-through pond.		
4)	Clean holding tank.		
5)	Check levels on caustic and hydrochlorine.		
6)	Clean clarifler.		
7)	Clean feed pumps & floc line.		
8)	Clean up spills-acid-copper-etc.		
9)	Help oil delivery man.		
10)	Clean sampler discharge pipe.		
11)	Thaw out frozen pipes.		

	Lagoons #1, #2/Daily		REMARKS
1)	Inspect Fleeboard Level		
2)	Inspect Vegetation		
3)	Inspect for leaks, deterioration or failures in the impoundment.	· · · · · · · · · · · · · · · · · · ·	
4)	Inspect outfall 001 intake for restrictions		
5)	Take samples of liquid and solids to lab for analyses		

TREATMENT METHODS AND PROCEDURES

I. GENERAL

- 1.1) FLOW DIAGRAMS I THROUGH 6 SHOW THE WASTE WATER FLOW FROM
 POINT OF ORIGIN TO AND THROUGH THE WASTE TREATMENT PLANT.
- 1.2) ONCE EACH DAY, CHECK A SAMPLE OF THE DISCHARGE FROM THE SAMPLER FOR THOSE ITEMS SHOWN ON PAGE 2 OF THE PERMIT.

 NOTE THAT A GRAB SAMPLE, TAKEN AT THE SAME TIME, SHALL BE USED FOR PH, OIL AND GREASE AND TOTAL CHLORINE RESIDUAL.
- 1.3) BATCH DISCHARGE FROM THE TREATMENT TANKS BEFORE DISCHARGE
 TO THE CLARIFIER SHALL BE CHECKED FOR THOSE ITEMS SHOWN
 ON PAGE 4 OF THE PERMIT.
- 1.4) A SAMPLE OF SLUDGE FROM THE UNDER FLOW OF THE CLARIFIER SHALL BE CHECKED FOR THOSE ITEMS COVERED ON PAGE 5 OF THE PERMIT WEEKLY.
- 1.5) ONCE EACH MONTH, STARTING SEPTEMBER 1, 1976, A SAMPLE OF THE WATER FROM EACH OF THE STAB WELLS SHALL BE CHECKED FOR THOSE ITEMS SHOWN AT BOTTOM OF PAGE 6 OF THE PERMIT.
- 1.6) ONCE EACH DAY, RECORD FLOW METER READING.
- 1.7) CHECK OPERATION OF REACTOR CLARIFIER EACH DAY HIXER AND SWEEP DRIVE.
- 1.8) CLEAN PH METERS AS REQUIRED. STANDARDIZE PH METER ONCE EACH WEEK.

TREATMENT METHODS AND PROCEDURES

1. GENERAL, Continued

- 1.9) CHECK LIME CIRCULATING PUMP AND THE DE ZURIG VALVE AT THE CLARIFIER EACH DAY.
- 1.10) CHECK SAMPLER EACH -- CLEAN SUCTION STRAINER AS REQUIRED.

TREATMENT METHODS & PROCEDURES, CONTINUED

2. CYANIDE TREATMENT

THE FIRST STEP IN THE CYANIDE TREATMENT PROCEDURE IS VERY IMPOR-

THE CYANIDE IS DESTROYED (OXIDIZED) WITH SODIUM HYPOCHLORITE.

SODIUM HYPOCHLORITE CONTAINS FREE CHLORINE. SODIUM HYPO
CHLORITE IS A LIQUID AND IS RUN INTO THE CYANIDE WASTE UNTIL

THE TEST FOR FREE CHLORINE IS POSITIVE. AT THIS POINT THE

FREE CHLORINE IN THE SODIUM HYPOCHLORITE HAS OXIDIZED. (DESTROYED)

ALL THE CYANIDE.

2.1) TWO (2) INDICATORS HAY BE USED TO TEST FOR FREE CHLORINE,

THE POINT AT WHICH ALL THE CYANIDE IS DESTROYED.

2.1.1) ORTHO-TOLIDIN TEST

A SOLUTION OF ORTHO-TOLIDIN WILL SHOW A VIVID ORANGE COLOR; WHICH PERSISTS, WHEN A FEW DROPS ARE ADDED TO THE CYANIDE SOLUTION BEING TREATED WITH SODIUM HYPOCHLORITE, WHEN DESTRUCTION OF THE CYANIDE IS COMPLETE. CYANIDE IS STILL PRESENT IN THE SOLUTION BEING TREATED WHEN THE TEST WITH OROTHO-TOLIDIN SHOWS A DIRTY ORANGE COLOR THAT TURNS BLACK AND DISAPPEARS ALMOST IMMEDIATELY. THIS COLOR CHANGE SHOULD NOT BE CONFUSED WITH THE TRUE END POINT (CYANIDE ALL DESTROYED) COLOR, VIVID ORANGE.

TREATHENT HETHODS & PROCEDURES, CONTINUED

2.1.2) POTASSIUM LODIDE STARCH PAPER TEST

THE ORTHO-TOLIDIN TEST, FOR THOSE NOT FAHILIAR WITH THE COLOR CHANGES, IS NOT RELIABLE AND SHOULD ONLY BE USED WHEN TESTING SOLUTIONS LOW IN CYANIDE. THE MOST RELIABLE TEST TO USE TO CHECK FOR FREE CHLORINE IN THE TREAT-ED CYANIDE SOLUTION IS THE POTASSIUM IODIDE STARCH TEST PAPER. THIS TEST PAPER HAS BEEN SATURATED IN A SOLUTION OF POTASSIUM IODIDE AND STARCH. WHEN THIS WHITE PAPER IS DIPPED INTO A SOLUTION CONTAINING FREE CHLORINE, IT TURNS A VERY DARK PURPLE TO BLACK COLOR. TO PERFORM THE TEST. HERELY DIP THE PAPER IN THE CYANIDE SOLUTION TO BE TESTED. A COLOR CHANGE FROM WHITE TO DARK PURPLE OR BLACK INDICATES THAT FREE CHLORINE IS PRESENT AND THE CYANIDE IS DESTROYED.

- 2.2) THE STEPWISE TREATMENT PROCEDURE FOR DESTRUCTION (OXIDA-TION) OF CYANIDE IS AS FOLLOWS:
 - 2.2.1) RUN SODIUM HYPOCHLORITE INTO CYANIDE TANK TO

 BE TREATED UNTIL TEST WITH ORTHO-TOLIDIN SHOWS

 A VIVID ORANGE COLOR. LET STAND FOR 20 MIN
 UTES; CHECK AGAIN WITH ORTHO-TOLIDIN, IF COLOR

 IS VIVID ORANGE, PROCEED WITH [2]. IF NO

 COLOR CHANGE, ADD SODIUM HYPOCHLORITE UNTIL

TREATHENT METHODS & PROCEDURES, CONTINUED

- 2.2.1) Continued

 VIVID ORANGE. LET STAND 20 MINUTES AND CHECK

 AGAIN. CONTINUE IN THIS MANNER UNTIL COLOR

 PERSISTS. PROCEED WITH STEP [2].
- 2.2.2) CHECK TREATED SOLUTION WITH POTASSIUM IODIDE

 STARCH TEST PAPER. COLOR CHANGE OF PAPER TO

 DARK PURPLE OR BLACK INSURES THAT THE CYANIDE
 IS DESTROYED.
- 2.2.3) ADD TO LBS. SODIUM BISULFITE.
- 2.2.4) ADD 20 LBS FERROUS SULFATE.
- 2.2.5) RAISE pH TO 10.5-11.0.
- 2.2.6) ADD 2-3 GALLONS 350-H. 7 PW 25
- 2.2.7) AGITATE FOR 1/2-1 HOUR.
- 2.2.8) PUMP TO POND NUMBER ONE (1). IF THERE IS NO TREATED CHROMIUM TO PUMP TO THE CLARIFIER.

 PUMP TREATED CYANIDE TO THE CLARIFIER.

TREATMENT METHOD'S & PROCEDURES, CONTINUED

- 2.3) ALTERNATE TREATHENT FOR CYANIDE DETRUCTION.
 - 2.3.1) FOLLOW TREATHENT STEPWISE, STARTING WITH 2.2.1
 THROUGH 2.2.3.
 - 2.3.2) ADD 5 LBS SODIUM HYDROSULFITE.
 - 2.3.3) ADD 2-3 QTS. NO. 114. AGITATE FOR 15 HINUTES.
 - 2.3.4) ADD 15-20 LBS. ALUMINUM SULFATE. AGITATE 15
 - 2.3.5) RAISE pH TO 10.5-11.0. AGITATE
 - 2.3.6) PUMP TO POND NUMBER ONE (1). IF THERE IS NO TREATED CHROMIUM TO PUMP TO CLARIFIER THEN PUMP TREATED CYANIDE TO THE CLARIFIER.

3. CHROHIUM TREATHENT

3.1) LOWER PH TO 3.5 - 4.0 WITH SULFURIC ACID. ADD SODIUM BISULFITE UNTIL COLOR CHANGES FROM YELLOW TO BLUE. 400
LBS. OF SODIUM BISULFITE IS USUALLY ENOUGH. THEN ADD
10 LBS. SODIUM HYDROSULFITE. PUMP TO CLARIFIER AS
SLOWLY AS POSSIBLE.

TREATHENT METHODS & PROCEDURES, CONTINUED

3.2) TO CHECK FOR COMPLETE REDUCTION OF CHROMIUM, PROCEED AS
FOLLOWS: TO A SMALL SAMPLE OF THE TREATED SOLUTION IN
A BEAKER, ADD A LITTLE LIME, SHAKE, THEN ADD A FEW
GRANULES OF A-22 FLOC. POUR CLEAR LIQUID INTO A TEST
TUBE, ADD 5 DROPS GULFURIC ACID THEN IO DROPS CHROMIUM
INDICATOR. A CHANGE IN COLOR, PINK TO PURPLE, INDICATES
CHROMIUM IS NOT COMPLETELY REDUCED.

4. CHARIFIER

4.1) SET pH METER AT 9.6 FOR ALL PRODUCTION DAYS AND TANK MAINTENANCE DAY. SET pH METER BACK TO 8.5 LATE NIGHT OF
LAST PRODUCTION AND AT END OF TANK MAINTENANCE DAY.

5. NEUTRALIZATION CHAMBER

5.1) SET pH HETER AT 9.6.

6. FLOC FEEDERS

6.1) SET FEEDER AT 100% FOR ALL PRODUCTION DAYS. FILL TANK

LATE THE NIGHT OF EACH PRODUCTION DAY AND END OF TANK

MAINTENANCE DAY.

7. LIME SLURRY TANK

7.1) MAKE UP A FULL TANK LATE THE NIGHT OF EACH PRODUCTION DAY

AND AT END OF TANK MAINTENANCE DAY. THIS IS VERY IMPOR
TANT.

TREATMENT METHODS & PROCEDURES, CONTINUED

8. LIQUID CAUSTIC FEED TANK

8.1) MAKE UP A FULL TANK LATE THE NIGHT OF EACH PRODUCTION DAY AND END OF TANK MAINTENANCE DAY.

9. SHALL LIQUID CAUSTIC FEED TANK

9.1) MAKE UP A FULL TANK LATE THE NIGHT OF EACH PRODUCTION DAY AND END OF TANK MAINTENANCE DAY.

10. CHEMICAL HAKE-UP

- 10.1) LIME SLURRY
 - 10.1.1) USE 400 LBS. LIME FOR MAKE-UP.
 - 10.1.2) USE 5 LBS. LIME PER INCH FOR MAINTENANCE.
- 10.2) FLOC TANK
 - 10.2.1) 2 CUPS FLOC (3 OZ.) PURIFLOC A-22 PER 16 INCHES.

 SMALL FEEDER.
 - 10.2.2) 3 CUPS FLOC FOR LARGE FEEDER.
- 10.3) CAUSTIC SODA FEED TANK
 - 10.3.1) MAKE UP WITH ONE PART LIQUID CAUSTIC TO ONE PART WATER IN WINTER.
 - 10.3.2) MAKE UP WITH FULL STRENGTH LIQUID CAUSTIC IN SUMMER.
- 10.4) SHALL CAUSTIC FEED TANK
 - 10.4.1) MAKE UP WITH 25% LIQUID CAUSTIC SODA.

TREATHENT METHODS & PROCEDURES, CONTINUED

- 11. THERE MUST BE A SUPPLY OF THESE ITEMS IN THE PUMP HOUSE AT ALL TIMES.
 - 11.1) pH PAPERS -- 6-8, 8-9.5, 10-12
 - 11.2) OTHO-TOLIDIN
 - 11.3) POTASSIUM IODIDE STARCH TEST PAPERS
 - 11.4) CHROME INDICATOR
 - 11.5) DEFOAMER

St Die Casting Division
Hou an Universal, Inc.
232 Monroe Street
Saline, Michigan 48176
Tel. (313) 429-9411

MID 980 795 512

HOOVER UNIVERSAL

December 3, 1982

Mr. Chuck Bikfalvy
Water Quality Specialist
Department of Natural Resources
Water Quality Division
9311 Groh Road
Grosse Ile, Michigan 48133

Dear Mr. Bikfalvy:

RECEIVED

DEC 0 6 1982

WATER QUALITY DIV.

In ensuer to your memorandum of October 19, 1982, I answer the deficiencies you noted (during your inspection of September 1) as follows:

- 1) We have no training records because our people were trained prior to Act 265.16 (RCRA of 1976).
 - We are setting up a training procedure whereby the people will be checked twice per year (Jan. 1 & June 1) to make sure they are aware of the current procedures.
- 2) An emergency equipment list is being added to our contingency plan, including location, description and capability of each item, as required by 265.52 (3).
- 3) A written sampling procedure and an updated analysis plan is being implemented as required by 265.92 (a).
- 4) Estimated plant closure date of the year 2000 was added to our closure plan as required by 265.112 (a) (4).

Sincerely yours,

HOOVER UNIVERSAL, INC. Die Casting Division/Saline

William J. Tischler Technical Director MID 980 7-512

98 12-1-83 Code 0

RCRA Inspection Report

EPA Identification N	lumber: M	<u>I</u> 27.	0. 0 1	977	<u></u>	-
Installation Name:	HOOVER UN	VERSAL - SA	LINE DI	E CASTING	DIVISI	ON
Location Address:	232.	Monroe.	Street			
city: Saline		State: Mid	man 4	8176		: *
Date of inspection:	9-20-83	7 Time of inspe	ction (from)	11:00 (t	o) <u>11.3</u>	2
		Title		Tel ephone		
Person(s) interview	and the second s	Λ.	2. 1		0 A L 1	ţ.
WILLIAM J.	TISCHLER	- Technical	Director	(313)4-2	4-741	
						
Inspector(s)		Agency/Title	2	Telephone		
HIEN Q NI	GUYEN	Mich DNR	/Env. Eng	(517) 34	12-168	7
			7	-		
Installation Activi	ty (mark only	one box)	y	Inspection	Form(s)	
				1.		
Treatment/Stora Generation and/		r 40 CFR 265.1 and ion	l/or	А	See ler	marks
	ge/Disposal (n	o generation or Ti	ransportation	n)		
☐ Generation and	Transportation			В,	, с	
☐ Generation only	•		· ·	В		
	only			c	· · · · · · · · · · · · · · · · · · ·	

remarks: This was a follow-up inspection regarding items listed in my August 2, 1983 letter.

Host of the deficiencies listed in my May 5,1993 letter from the previous inspection have been corrected properly. However, at the time of the inspection, the groundwater monitoring report (prepared by a consulting firm) was not complete yet. Note: M. Tischler contacted my office on Octobe 19, 1983 and confirmed that the groundwater maniforing report just complete and sent to EPA & Mich. DNR. Excep their groundwates monitoring systems which will be evaluated leter in Novemble (attached), the facility has consected all the deficiencies

February 29, 1984

Mr. William J. Tischler Hoover Universal Inc. 232 Monroe Street Saline, Michigan 48176

Dear Mr. Tischler:



As part of our FY84 Hazardous Waste Management Cooperative Agreement with the U.S. EPA, we are obligated to review the adequacy of the closure and post-closure plans for all major hazardous waste treatment storage and disposal facilities (TSDFs) in the State. All TSDFs which are licensed under 1979 P.A. 64, as amended, and those which are subject to the RCRA part 264/265 Subpart F groundwater monitoring requirements are defined as a major facility. EPA and the Department have also identified additional "major" facilities on the basis of the type and quantity of waste treated generated or disposed of.

Your facility is considered a "major" facility. Therefore, please submit two up-to-date copies of your closure/post closure plans for your hazardous waste activities by March 15, 1984.

The plans should be sent to the following address:

Hazardous Waste Division Michigan Department of Natural Resources P.O. Box 30038 Lansing, Michigan 48909

If you have questions regarding this letter, please contact Mr. Alsa Howard, Chief of our Technical Services Section at 517-373-2730.

Sincerely,

Delbert Rector, Chief Hazardous Waste Division 517-373-2730

Ce: U.S. EPA L District, Bob Basch

JAMES F. CLEARY, Acting Director

August 2, 1983

Mr. William J. Tischler, Technical Director Hoover Universal, Inc. Saline Die Casting Division 232 Monroe Street Saline, Michigan 48176

MID 980 795517

Re: RCRA Inspection

Dear Mr. Tischler:

This is to acknowledge receipt of your letter and documents dated July 19, 1983, regarding the deficiencies as outlined in my May 5, 1983 letter. The information submitted; however, did not address the following items:

- Job titles and job descriptions as required in 40 CFR 265.16 (d)(1) and (2).
- Records as required in 40 CFR 265.94.

We intend to conduct a follow-up inspection in the first week of September 1983 to re-evaluate compliance of your facility with requirements of 40 CFR 265.16(d), 265.73, and 265.94 (attached).

If you have any questions, please call me at (517) 322-1687.

Sincerely,

HAZARDOUS WASTE DIVISION

Hien Q. Nguyen Environmental Engineer

HQH/slp

cc: Bohunsky/Hazardous Waste Div. U.S. EPA - Region V

Attachment

Salii Fe Casting Division Hoover Universal, Inc. 232 Monroe Street Saline, Michigan 48176 Tel. (313) 429-9411

July 19, 1983

Mr. Hien Q. Nguyen Environmental Engineer/Lansing District Michigan Department of Natural Resources Stevens T. Mason Building P.O. Box 30028 Lansing, Michigan 48909

Dear Mr. Nguyen:

In response to your letter dated May 5, 1983, regarding RCRA inspection for Saline Die Casting Division (MIT 270019771), I enclosing the information you require.

We also have the following in-plant safety equipment:

One Lincoln Welder portable generator (5,000 Watts)

Two self-contained artificial breathing units

Fire safety equipment list, attached.

If you have any questions, give me a call.

Sincerely yours,

HOOVER UNIVERSAL, INC.

Die Casting Division/Saline

William J. Tischler

Technical Director

jm.

Attached: Inspection Schedule

Waste Treatment/Procedures & Methods Test

List of Fire Brigade Members

Fire Brigade Responsibilities & Duties List

Layout/Plant Fire Extinguishers

JUL 2 1 1983

PERMANENT DISTRICT

pent w/ previously put mitted inspection 10-83

ing Division 232 Mocroe Street Saline, Michigan 48176 (313)429-9411

May 23, 1983

Hien Q. Nguyen, Environmental Engineer Michigan Department of Natural Resources Stevens T. Mason Building P.O. Box 30028 Lansing, Michigan 48909

MID980795512

Dear Mr. Nguyen:

In reference to RCRA inspection for Hoover Universal's Saline Die Casting Division, permit number MIT 27001977I.

Per your letter of May 5, please extend compliance return letter to Thursday, June 30, 1983.

Thank you.

Sincerely yours,

HOOVER UNIVERSAL, INC. Die Casting Division/Saline

William J. Tischler

Technical Director

jm

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The previous S Oliver - Previously Submitted.

MID 980795 512

Mr. William J. Tischler, Technical Director Hoover Universal, Inc. 232 Monroe Street Saltme, Wichigan 49179

> Re: RCRA Inspection - Hoover Universal Saline Die Casting Division HIT 270019771

Dear Dr. Tischler:

On Parch 31, 1933, staff of the Department of Natural Resources coeducted an inspection of the referenced facility to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCNA) as amended.

The following summary outlines the deficiencies found during the above inspection:

- 1. The written inspection schedule as specified in 40 CFR 265.15(b) (1), (2), (3), and (4) was not available at the facility.
- 2. An inspection log or successy was not available as required by 40 CFR 265,15(6).
- 3. Personnel training records were not available at the facility as required by 40 CFR 260.16(d) (1), (2), (3), and (4).
- 4. The operating record did not contain sufficient information as specified in 40 CFR 265.73.
- ·S. The facility currently has a Pollution Incident Prevention Plan (PIPP). However, to comply with the requirements of 40 CFR 265.52, the facility needs to amend that plan to incorporate a list of all emergency equipment and an evacuation plan as specified in 40 CFR 265.52(e) and (f).

Mr. William J. Tischler May 5, 1983 Page 2

We request that you respond to this latter by May 23, 1983, providing documentation to this office regarding those actions taken to correct these violations. Please also send us a copy of your groundwater monitoring report as specified in 40 CFR 265.94(a)(2)(ii), and (iii) for our information.

Envioued in a copy of the inspection report extper your request. If You all a kay quadrious or meed any information, please do not hesitate to call to at (SIV) 522-1667.

Simograly.

MAZARMOUS MASTE PUMESION

Mic Q. Mysyn

Hea (. Hower Environmental Engineer Lansing District

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NI	extron III
, E	125 5-17-83
9	255

RCRA Inspection Report

EPA Identification Number: $M = I$	T 270010	1771
Installation Name: HOOVER	UNIVERCAL Inc.	
Location Address: 232 Mon	roe St	
city: Saline	State: MICHIGAN	48176
Date of inspection: $\frac{3 \cdot 3 \cdot 1 \cdot \cancel{\cancel{3}} \cdot \cancel{\cancel{3}}}{3 \cdot 3 \cdot 1 \cdot \cancel{\cancel{3}} \cdot \cancel{\cancel{3}}}$	Time of inspection (from)	1:30 fr (to) 4:30
Person(s) interviewed	Title	Telephone
WILLIAM J. TISCHLER	TECH DIRECTOR	313 429 -99/1
	:	
Inspector(s) RICK LUNDGREN WEN NGUYEN Installation Activity (mark only of	Mich DNS/Eno. Eng.	Telephone (SIT) 3-22 - 1300 (SIT) 3-22-148 Inspection Form(s)
Treatment/Storage/Disposal per Generation and/or Transportation		A.
	generation or Transportation)	Å
☐ Generation and Transportation		B, C
☐ Generation only		В
		С

Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- 2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit appli	cation	n process(es) (EPA Form 3510-3) I	nspection	Form /	<u> section(s)</u>
102		storage in containers			I
\$02		storage in tanks	-		J
T01	II	treatment in tanks			J
\$04	If	storage in surface impoundment			K,F
T02		treatment in surface impoundment	•		K,F
D83	\prod	disposal in surface impoundment			K,F
\$03	II	storage in waste pile			L
D81		disposal by land application			M,F
D80		disposal in landfill			N,F
Т03	\prod	treatment by incineration		•	0/P
. T04	П	treatment in devices other than ta impoundments, or incinerators	nks, surf	ace	Q
Other activities					
GENERATOR	IV		APPE	NDIX (GN)
TRANSPORTER			APPE	XIDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

Either Sey er TCR (Storage or treatment in surface improved ments)

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

News

٠	Section B: GENERAL FACILI	ITY STANDARDS:	: (Part	t 265 Subpart B)	
v)		YES NO	NI*	Remarks	*
1.	Has the Regional Administrator been notified regarding: 265.12		-		
	a. Receipt of hazardous waste from a foreign source?	N/A			
	b. Facility expansion?	٠٠٠			
	c. Change of owner or operator?	service and the service and th		<u></u>	
2.	General Waste Analysis: 265.13		are and a second		
	a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?		-		· · · · · ·
	b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u> </u>	· .		
	c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	N/A		No heards	eus waste L sources
3.	Security - Do security measures include (if applicable) 265.14	e:	·		, ·
	a. 24-Hour surveillance?	<u> </u>			
	or b. i. Artificial or natural barrier around facility?	<u> </u>			
	and ii. Controlled entry?				
	<pre>c. Danger sign(s) at entrance?</pre>				***************************************
4.	Owner or operator inspections: 265.15	-,			
4	a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that				
:	may affect human health or the environment?	<u></u>			

		Y	ES	ИО	NI	Remarks
`.)	b. Does the owner or operator have an inspection schedule at the facility?			1		the upither orbidate
-	c. If so, does the schedule address the inspection of the following items:					at the time of the she shopedion.
	<pre>i. monitoring equipment?</pre>					All items are ins-
	ii. safety and emergency equipmen	it?				jected but no
	iii. security devices?				-	witten schelule
	iv. operating and structural equi	p-)?				availette
	v. type of problems to be looked for during the inspection (e. leaky fitting, defective pump etc.)?	g.	- , ,			
	vi. inspection frequency (based u the possible deterioration ra of the equipment)?	pon te				
	d. Are areas subject to spills inspe ed daily when in use?	ct			•	
	e. Does the owner or operator mainta an inspection log or summary of owner or operator inspections?	in .		<u> </u>	-	not available
	f. Does the inspection log contain t following information:	he				
	i. the date and time of the insp	ection? _		_		
	ii. the name of the inspector?				-	
	iii. a notation of the observation made?	ss	 -		·	
	<pre>iv. the date and nature of any repairs or remedial actions?</pre>	· 				
	Do personnel training records include: 265.16				hot	available at :
	a. Job titles?				— (() ——	es facility
	b. Job descriptions?					· ·

			1E2 NO	14 T	Kemarks
	C.	Description of training?	namenton to a province and a provinc	, angles is designed to the control of the control	· · · · · · · · · · · · · · · · · · ·
	d.	Records of training?			
-	e.	Did facility personnel receive the required training by 5-19-81?	· <u> </u>	W-10	
	f.	Do new personnel receive required training within six months?			
	9.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?			
•	req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265			no ignifalle:
	ð.	Special handling?	10 /\	Troil-	ho near tive or
	b.	No smoking signs?	-		in compatible war
	с.	Separation and protection from ignition sources?			
		·			

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

	Maintenance and Operation of Facility: 265:31		YES	NO	NI	Remarks	
	Is there any evidence of fire explosion, or release of hazardous waste or hazardous waste constituent?	≘,				WCHILI N. 3	
2.	If required, does the facility have the following equipment:	265.32					
	a. Internal communications or alarm systems?		<u> </u>	·			
	b. Telephone or 2-way radios at the scene of operations?		<u>√</u>				
	c. Portable fire extinguishers fire control, spill control equipment and decontaminati equipment?	•					
	Indicate the volume of water and	d/or foam	ı avai	lable	for fi	re control:	
	54,000 gallen	A A u	oate,				
	200 Foam 20	tingui					
3.	Testing and Maintenance of Emergency Equipment: 265.33						
	a. Has the owner or operator established testing and maintenance procedures for emergency equipment?		<u> </u>				
	b. Is emergency equipment maintained in operable condition?						
4.	Has owner or operator provided immediate access to internal alarms? (if needed) 265.34		· /				
5.	Is there adequate aisle space for unobstructed movement?		1	-			
6.	Has the owner or operator attem to make arrangements with local authorities in case of an emerg at the facility?	`	: 				
						•	

Does the Contingency Plan contain the following information: 265.52

- a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
- b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
- Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

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		in the	fire	prevention
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Δ					

- 3. Emergency Coordinator 265.55
 - a. Is the facility Emergency Coordinator identified?
 - b. Is coordinator familiar with all aspects of site operation and emergency procedures?
 - c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?
- 4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

<u> </u>	
<u> </u>	
	none has occurred
NA	9000 9 00 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND R. ORTING: (Part 265 Subpart E) YES NO NI Remarks Use of Manifest System 265.71 a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.) b. Are records of past shipments retained for 3 years? Does the owner or operator meet requirements regarding manifest discrepancies? 265.72 ** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources. Operating Record 265.73 the facility has a good operating record for Does the owner or operator maintain an operating record as required in 265.73? Does the operating record contain the following information: The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?

by a manifest.)

The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by

ji.

^{***}iii. A map or diagram of each cell or disposal area

^{***} only applies to disposal facilities

- Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?
- b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

^{5.**}Unmanifested Waste Reports

Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

YES NO NI

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

Has the owner or operator	
facility implemented a gro	ound-
 water monitoring system?	265.90

If "no", Skip to number 11.

2. Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)?

If "yes", skip to number 12.
If "no", continue

- Does the groundwater monitoring system meet the following requirements of 265.91:
 - At least one well installed hydraulically up-gradient from the limit of the waste management area?

Indicate the total number of up-gradient wells.

At least three wells installed hydraulically down-gradient at the limit of the waste management area?

> Indicate the total number of downgradient wells.

Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?

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tivo (2)	•			
<u> </u>				
	-			
live (5)	· ·			
1				

Remarks

Sketch the locations of the wells relative to the waste management area.

See attacked graph

		YES NO NI	Remarks
	d. Are the monitoring wells constructed in accordance with 265.91(c) (e.g. pro- perly cased, screened, etc.)?		
1.	Has the owner or operator developed a written ground-water sampling and analysis plan that includes procedures and techniques for: 265.92		
	a. Sample collection?	<u> </u>	
	b. Sample preservation and shipment?	<u> </u>	
	c. Analytical procedures?	<u> </u>	
	d. Chain of custody control?	<u> </u>	
5.	Does the owner or operator follow his groundwater sampling and analysis plan?	<u> </u>	
	Is the groundwater sampling and analysis plan maintained at the facility?	<u> </u>	
7•	Has the owner or operator determined the concentration or value of all the groundwater monitoring parameters of 265.92(b) in accordance with paragraphs c and d of 265.92?		

			IES	NU	MT		Remarks
٠	an wat	the owner or operator developed outline of a comprehensive grounder quality assesment program that capable of determining: 262.93					
	a.	Whether hazardous waste or hazardous waste constituents have entered the groundwater?				_	BY JEA
	b.	The rate and extent of migration of hazardous waste or hazardous waste constituents in the groundwater?		, established	,		country tra
	,C.	The concentration of hazardous waste or hazardous waste constituents in the groundwater?					
*9.	a s wat	the owner or operator performed tatistical analysis of his grounder monitoring data as required in .93(b)?	· ·		<u> X</u>		
10.	inc	there a statistically significant rease (or pH decrease) detected in well?			<u> </u>		
	a.	If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?	-		<u>X</u>		
		Skip to number 14			٠		
17.	writ	the owner or operator prepared a tten groundwater monitoring waiver onstration for the facility?	·	<u> </u>	e		N/A
	đ.	Is the waiver demonstration maintained at the facility?			-		

Has the waiver demonstration been certified by a qualified

geologist or geotechnical . engineer?

Note: Inspectors should request a copy of the waiver document.

Skip questions 12, 13, and 14.

^{*}These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

12. Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?

a. Has the plan been certified by a qualified geologist or geotechnical engineer?

Upr___

Note: If the plan for an alternate groundwater monitoring system was not submitted to the Regional Administrator the inspector should request a copy for review.

13. Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?

14. Does the owner or operator submit reports and maintain records as required in 265.94?

						YES	N	0	NI	R	lemarks			-	
1.	Clo	sure	265	5.112											
	a.			acility clos ilable for i			/ 								
	b.	Does	the	plan identi	fy:			·					·		
		i.		num extent unfacility lif		<u>√</u>	/ 						•		
		ii.	maxi vent	mum hazardou ory?	s waste in-	·	/ ·	<u> </u>	Military appropria	. •					
-		iv.	esti	mated year o	f closure?						alfor	<u>:x .</u>	200	<u></u>	
		٧.	sche	dule of clos	ure activit	ies? 🔽	·								
	C.	Has	clos	ure begun?	e e e e e e e e e e e e e e e e e e e		· 	<u>/</u>							
2.	Pos	st-Cl	osure	265.118						à,	(n=				
	a.			ost-closure ection?	plan availab	ole									
	b.	Doe:	s thi	s plan conta	in:						•		. ,		
		i. '	moni	ription of g toring activ uencies?		, mar. st. st. st. st. st. st. st. st. st. st					*				
		ii.		ription of m vities and f		· ·						•			
			AA.	integrity o cover, or c structures, cable	ontainment			; /) /	/ · · · · · · · · · · · · · · · · · · ·		•			
			вв.	facility mo	nitoring equ	ıip-		1							
	÷	iii.	of p	ment , address, a erson or off ng post-clos	ice to conta	act				-			-		
	, C.	Has	the	post-closure	period beg	ɪn ? /^		<u>. </u>		_	·				
	ď۰			ritten post- available?		t	-								

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Section I - US_ AND MANGEMENT OF CONTAINERS (F t 265, Subpart I)

		YES NO	ΝI	Remarks
1.	Are containers in good condition? 265.171	<u>/</u>		. there are carly.
2.	Are containers compatible with waste in them? 265.172	<u> </u>		two dempstize which
3.	Are containers managed to prevent leaks? 265.173			contain filter cakes
4.	Are containers stored closed?			which are generated
5.	Are containers inspected weekly for leaks and defects.	<u> </u>	· <u></u>	by the treatment process.
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.176		non Mammille
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177			the incompatible
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			wastes
		/		

Section J - TANKS (Part 265, Subpart J)

	•	162 110 111	Memarks		
].	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	· · · · · · · · · · · · · · · · · · ·	No	fan Es	
2.	Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?				
3.	Do continuous feed systems have a waste-feed cutoff?				
4,	Are waste analyses done before the tanks are used to store a substantially different waste than before?	265.193		<u> </u>	·
5.	Are required daily and weekly inspections done? 265.194		/		
6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	265.19 8		-	
7.	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)				
8.	Has the owner or operator observed buffer zone requirements for tanks Tank capacity:gallons Tank diameter:feet	containing ignit	able or	reactive was	
	Distance of tank from property 1 (See table 2 - 1 through 2 - 6 c Code - 1977" to determine compl	of NFPA's "Flamma			Liquids

Section K - SURFACE IMPOUNDMENTS (Part 265, Subpart K)

3	Do surface impoundments have	IES NO RI		Remarks
	at least 60 cm (2 feet) of freeboard? 265.222	<u> </u>		· · · · · · · · · · · · · · · · · · ·
2.	Do earthen dikes have protective covers? 265.224	<u> </u>		grass cover
3.	Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225	NA		
4.	Is the freeboard level inspected at least daily? 265.226	<u> </u>	. .	
5.	Are the dikes inspected weekly for evidence of leaks or deterioration?	<u> </u>		
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229	NA	-	
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230	N A	_	

Section L - WASTE PILES (40 CFR Part 265, Subpart L)

		YES	ИО	NI	Remarks	
1.	Are waste piles covered or protected from dispersal by wind? 265.251	d 				
2.	Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252		·		<u> </u>	
3.	Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253	· 				
4.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256			/		•
5.	Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	7			_	
6.	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257			Walter or the control of the control		-
7.	Are piles of incompatible waste protected by barriers or distance from other waste?					

Section M - LAND TREATMENT (Part 265, Subpart M)

-	•	YES	NO	NI	Remarks		
1.	Is treated hazardous waste capable of biological or chemical degradation? 265.270					 	. "
2.	Are run-off and run-on diverted from the facility or collected			÷			
3.	Is waste analyzed according to 265.273?						
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?						
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278						
6,	Does the unsaturated zone moni- toring plan address the minimum information specified in 265.278?						
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279			. · · · · ·			
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281		·			· · · · · · · · · · · · · · · · · · ·	
9.	Are incompatible wastes land treated? (If yes, 265.17(b)						

		Section N - LAND	FILLS	.(Part	265,	ubpart N)
			YES	NO	NI	Remarks
•	Gene Does	eral Operating Requirements 265.302 s the facility provide the following:		. •		
	a.	Diversion of run-on away from active portions of the fill?		· · ·		
	b.	Collection of run-off from active portions of the fill?				
	C.	Is collected run off treated?		:		
	d.	Control of wind dispersal of hazardous waste?		·		
2.		veying and Recordkeeping 265.309 s the Operating Record Include:	·	. •		
	ā.	A map showing the exact location and dimensions of each cell?				
	b.	The contents of each cell and the location of each hazardous waste type withing each cell?				
3.	rea act mix act	cial requirements for ignitable or ctive waste. Are ignitable or re- ive wastes treated so the resulting ture is no longer ignitable or re- ive? (Indicate if waste is ignitable reactive.) 265.312				
4.		cial Requirements for Incompatible tes. 265.313				

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

Does the owner or operator dispose of incompatible waste in separate cells? (If not, the provisions of 40 CFR 265.17(b) apply.)

- 5. Special requirements for liquid waste 265.314
 - a. Are bulk or non-containerized liquids placed in the landfill? If "yes," complete items i, ii, and iii.
 - i. Does the landfill have a chemically and physically resistant liner system?
 - ii. Does the landfill have a functional leachate collection system?
 - iii. Are free liquids stabilized
 prior to or immediately after
 placement in the landfill?
 - b. Have containers holding free liquids been placed in landfill since March 22, 1982?
- 6. Special requirements for Containers
 Are empty containers crushed flat, 265.315
 shredded, or similarly reduced in volume
 before being buried beneath the surface
 of the landfill?

	<u>ermin</u>	ation of Steady State	I=incinerat	tor T=th	ermal		
a.	Туре	of unit (i.e., type				eatment):	
b.	Comp	onents and steady sta	te conditio	n: I 265.	.343 T	265.373	
	Was	each component at ste	ady state p	rior to ac	dding wa	ste?	
		Component		YES NO	NI	Remarks	
				<u> </u>	<u> </u>		
			*	<u> </u>			
			and the same that the same tha		· <u>- · · ·</u>	-	
			*	-			
				- 			
Was	ste A	nalysis I 265.3	345 T	265.375			•
a.	Min not	imum requirements, for previously burned/tre	r wastes eated.			• • • • • • • • • • • • • • • • • • •	
a.	Min not i•	previously burned/tre	eated. as an				
a •	not	Required analyses; had analysis been perform	eated. as an				
1.	not	Required analyses; had analysis been perform the following?	eated. as an			•	
	not	Required analyses; had analysis been performance the following? Heating value	eated. as an				
a.	not i•	Required analyses; had analysis been performance the following? Heating value Halogen content	eated. as an med for itten data				
a•	not i•	Required analyses; he analysis been perform the following? Heating value Halogen content Sulfur content Has documented or wribeen substituted for	eated. as an med for itten data				
1.	not i•	Required analyses; he analysis been performable following? Heating value Halogen content Sulfur content Has documented or write been substituted for of either:	eated. as an med for itten data				

	b.	List other paramters for which the waste establish steady state or determine the (Note in Remarks any which you feel show	types	of po	ollutant:	le owner or s which may	opera be en	ator to mitted.	
			VF C :	NO	81 T	Domanik a			
.	Mon	itoring and Inspections I 265.347	YES	NU	NI	Remarks			
		T 265.37					y. The second		
-	a.	Are combustion/emission control instruments monitored at least every 15 minutes?			·		-		
	b.	Is steady state maintained or corrections attempted?	-	and the state of t		Martin	· · · · · · · · · · · · · · · · · · ·	:	
	C.	Is stack plume observed at least hourly for normal color and opacity?							
	d.	Did any stack observations made by owner or operator show a plume different than normal?**	· 	<u> </u>					,
	e.	If "yes" to (d) above, were corrections made to return emissions to normal appearance?**	/			· · · · · · · · · · · · · · · · · · ·			
	f.	Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?							
						•		i e	
*	*Sp∈ thi	cify in Remarks for what period of time s is was checked.							
	9•	Are emergency shutdown controls and system alarms checked daily for proper operation?		· • • • • • • • • • • • • • • • • • • •					
-	<u>0pe</u>	en Burning T 265.382 (open burning does no	ot ap	ply to	incine	ration)		٠,	
	a.	Only complete this part if the facility open burns hazardous waste.					•		-
÷	-	i. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means other hazardous		•				,	
		waste is open-burned).							
						÷			
	• .	•			. *			•	

ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)

			-
Pounds of waste explosives or propellants	Minimum dist burning or d property o	etonation	
0 to 100	204 m 380 m	670 1,250	
1,001 to 10,000 10,0001 to 30,000	530 m 690 m	1,730 2,260	

Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

ý		YES	NO	NI	Remarks	
	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	· .		e de la constanta de la consta		
2.	Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?					
3.	Has the owner or operator addressed the waste analysis requirements of 265.402?	·				
4.	Are inspection procedures followed according to 265.403?	d -			The Wash Salah Parameter of Staff in Part Salah and a salah salah salah salah salah salah salah salah salah sa	
5.	Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	· <u> </u>	,			
6.	Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406					

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

Section	Α:	Scope

١.	Complete this Appendi	x if the	owner or	operato	or of a l	ISD fa	acility als	oateranan
	Hazardous Maste Chat	is subse	quently s	hipped o	off-site	for t	treatment.	storage.
	or disposal.						· · · · · · · · · · · · · · · · · · ·	

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

			YES	МО	NI	Remarks	:
(1)	Doe ava	es the operator have copies of the manifest ailable for review? 262.40				•	
(2)	mo	amine manifests for shipments in past 6 nths. Indicate approximate number of nifested shipments during that period.	25				· · · · · · · · · · · · · · · · · · ·
(3)	fol cop fes	the manifest forms examined contain the lowing information: (If possible, make pies of, or record information from, manist(s) that do not contain the critical ements). 262.21					•
	a.	Manifest document number?			-		
	b.	Name, mailing address, telephone number, and EPA ID number of Generator					
	C.	Name and EPA ID Number of Transporter(s)?			-		
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u> </u>				
	е.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?					
	f.	The total quantity of waste(s) and the type and number of containers loaded?		,			
	g	Required certification?	V				
	h.	Required signatures?	$\sqrt{}$				
4)	Rep	ortable exceptions 262.42					

- - For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. NONS
 - For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. $\frac{1}{1000}$

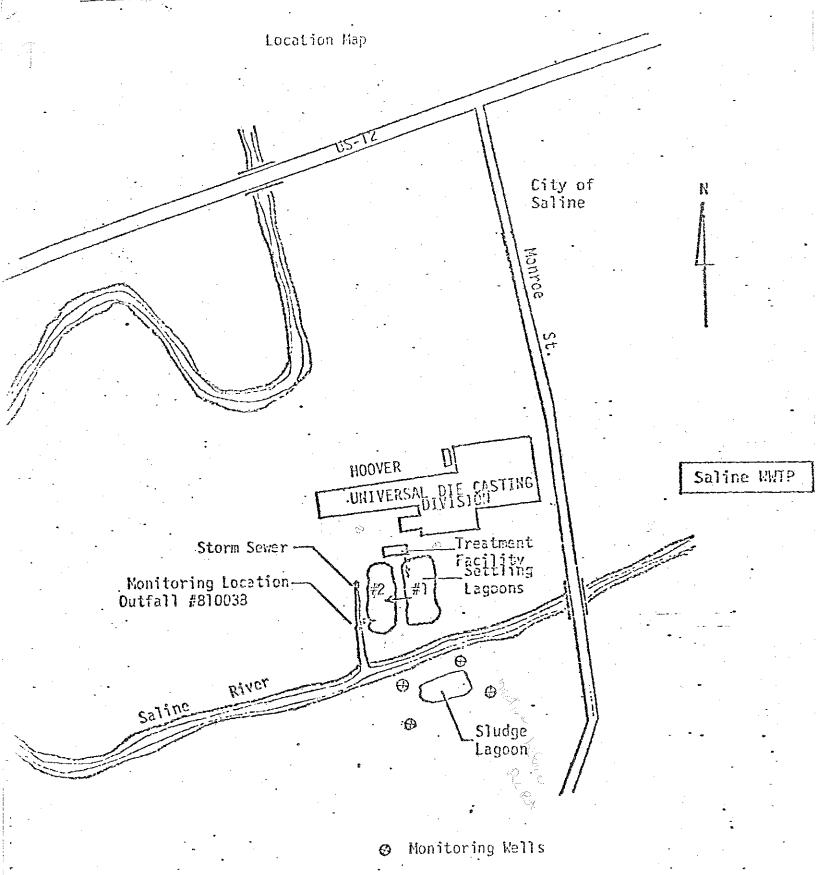
Sect	ion	C: PRE-TRANSPORT REQ REMENTS (Part 262, S	Subpar	t C)				· •
1. **	with (Red	waste packaged in accordance n DOT regulations? quired prior to movement of ardous waste off-site) 262.30	YE	S NO	i C	NI	Remarks	
2.	in a cond (Red	waste packages marked and labeled accordance with DOT regulations cerning hazardous waste materials? quired for movement of hazardous te off-site) 262.31 262.32	$\underline{\mathcal{V}}$				4:	5 B
3.		required, are placards available to nsporters of hazardous waste? 262.33			· 	- -	Unally provide	their own
4.	was with and to	site accumulation of generated hazardous was te it generates either (A) in its storage for h 40 CFR 262.34 [see 265.1(c)(7)]. Option I containers. If the installation elects op Section D. If the installation elects options: See 40 CFR 262.34 January 11, 1982 Rev	acilit B rest tion A on B,	y [2 rict , ch comp	65.1 s al leck	(b)] l acc this	or (B) in cumulation box 📝 a	accordance to tanks nd skip
	a•	Is each container clearly marked with the start of accumulation date?		· ·	 -			
	b.	Have more than 90 days elapsed since the date inspected in (a)?						
	С.	Do wastes remain in accumulation tanks for more than 90 days?	_		· .			
	d.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?			· //			
Sec	tion	D: - RECORDKEEPING AND REPORTING (Part 262	. Sub	part	D)	-		
1.	nee min	e all test results and analyses eded for hazardous waste deter- nations retained for at least ree years? 262.40	Y <u>∨</u>	ES 1	NO .	NI -	Remar	(S
Sec	tion	BE: - INTERNATIONAL SHIPMENTS (Part 262, Su	ubpart	E)				
1.		s the installation imported or ported Hazardous Waste? 262.50						
		answered Yes, complete the following applicable.)					·	
	g.	Exporting Hazardous waste; has a generator:						

- i. Notified the Administrator in writing?
 - ii. Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?
 - iii. Met the Manifest requirements?
- b. Importing Hazardous Waste; has the generator met the manifest requirements?

Appendix TR

Sec	tion A: SCOPE:	YES	МО	ΝI	Remarks	S	
1.	Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.				N	A	
2.	Does the transporter transport hazardous waste into the U.S. from abroad?				·		
3.	Does the transporter transport hazardous waste out from the U.S.?						
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?		·				
Sec	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Part	263	, Sub	part B)		•
1.	Are copies of <u>completed</u> manifests available for review and retained for three years. 263.22						
2.	Estimate the number of manifests for shipments completed during the part 6 months.	. ·			,	· · · · · · · · · · · · · · · · · · ·	÷ -
3.	Examine a representative number of manifests. Indicate number examined.				•		. · .
4.	Did transporter properly sign and date the manifests examined?		/		· · · · · · · · · · · · · · · · · · ·		
5.	Do any manifests indicate shipments delivered to other than the designated facility? 263.21		 -	· ·	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	
	If (5) is "no," skip 6 and 7.				· .		
6.	Do any manifests indicate shipments delivered to other than an alternate facility?		. <u> </u>	·			
7.	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?		·				

Figure 2 Hoover Universal, Inc. - Saline Die Casting Division



CPX



JACOB A. HOEFER
CARL T. JOHNSON
E.M. LAITALA
HILARY F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE



WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A TANNER Director
Water Quality Division
9311 Groh Road
Grosse Ile, Michigan 48138

STEVENS T. MASON BUILDING BOX 30028 LANSING, MI 48909

1078

October 19, 1982

CERTIFIED MAIL

Mr. William J. Tischler, Technical Director Hoover Universal, Inc. Saline Die Casting 232 Monroe Street Saline, Michigan 48176

Dear Mr. Tischler:

On September 1, 1982, I inspected your facility for compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976 as amended. A copy of my report is attached for your use.

The following deficiencies were noted during the inspection:

- 1. There were no training records available at the facility, as required by 265.16.
- 2. Your contingency plan did not include a list of emergency equipment, including location, description and capability of each item, as required by 265.52(3).
- 3. There was no written sampling and analysis plan at the facility, as required by 265.92(a).
- 4. Your closure plan did not include the estimated year of closure, as required by 265.112(a)(4).

Please respond in writing by November 26, 1982 detailing actions taken to correct the deficiencies noted above. Also, please feel free to

DECEIVED OCT 22 1982 ACT 63



Mr. William J. Tischler October 19, 1982 Page 2

contact me at (313) 675-0860, if you have any questions pertaining to hazardous waste management.

Sincerely,

WATER QUALITY DIVISION

Roy E. Schrameck, P.E.

By: Chuck Bikfalvy

Water Quality Specialist

RES:CB/sc

Enclosure

cc: Al Howard, OHWM (2)

file

RCRA Inspection Report

EPA Identification Number: M T		1771
Installation Name: HOOVER US	UIVERSALING, SAG	LINE DIE CASTIN
Location Address: 232 MOA		·
City: SAUNE	State: MICH.	.48176
Date of inspection: 9/1/82	Time of inspection (from)	10:15 (to) 1:00
Person(s) interviewed	Title	Tel ephone
WILLIAM S. TISCHLER	TECH DIRECTOR	(313) 429-9411
· ·		
Inspector(s) C. BIKFALVY	Agency/Title MONR WASTAB	Tel ephone (3/3) 675-0860
Installation Activity (mark only one	e box)	Inspection Form(s)
Treatment/Storage/Disposal per 40 Generation and/or Transportation	O CFR 265.1 and/or	A
	eneration or Transportation) A
☐ Generation and Transportation		B, C
☐ Generation only		В
☐ Transportation only		C

REGEIVS D IOCT 22 1902 ACT 64

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

- 1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- 2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit appli	cation	n process(es) (EPA Form 3510-3) Ir	spection	Form A	section(s)
\$01	VIII.	storage in containers		I	
\$02	H	storage in tanks		J	
T01	M	treatment in tanks		J	
\$04	II	storage in surface impoundment		K	,F
T02		treatment in surface impoundment		К	, ,F
D83	\prod	disposal in surface impoundment		ĸ	. , F
. 503	П	storage in waste pile		L	
D81	Ш	disposal by land application		ħ	1,F
D80		disposal in landfill	•	١	 F
T03	\prod	treatment by incineration		()/P
. то4	П	treatment in devices other than ta- impoundments, or incinerators	nks, surf	ace ()
Other activitie	<u>s</u>				
GENERATO	R II		APPE	NDIX (GN
TRANSPORTE	R 🎞		APPE	NDIX	TR

Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

504

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

NONE

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B) YES NO NI* Remarks Has the Regional Administrator been notified regarding: 265.12 Receipt of hazardous NA - W NOT RECIEVE waste from a foreign source? b. Facility expansion? NA - NO CHANGE Change of owner or operator? 2. General Waste Analysis: 265.13 Has the owner or operator obtained a detailed chemical and physical analysis of the waste? Does the owner or operator have a detailed waste analysis plan on file at the facility? c. Does the waste analysis plan specify procedures for inspection WASTE CHARACTERIZATION and analysis of each movement of hazardous waste from off-site? ONCE AYR. Security - Do security measures include: (if applicable) 265.14 24-Hour surveillance? or i. Artificial or natural barrier around facility? and ii. Controlled entry? c. Danger sign(s) at entrance? Owner or operator inspections: 265.15 Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardoùs waste that

may affect human health or

the environment?

		YES NO	NI i	Remarks
hav	es the owner or operator we an inspection schedule the facility?	<u> </u>		MONTHLY SAPETY INSPECTION, UNDOCUMENTED
the	so, does the schedule address e inspection of the following ems:			DANLY INSPECTION OF DISCHARGE
1.	monitoring equipment?	<u> </u>		
ii.	safety and emergency equipment?	<u> </u>		MONTHLY
iii.	security devices?	<u> </u>		SERVICE
iv.	operating and structural equip- ment (i.e. dikes, pumps, etc.)?	<u> </u>		SCICVICE
٧.	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<u> </u>		not recorbeb
vi.	<pre>inspection frequency (based upon the possible deterioration rate of the equipment)?</pre>			DAILY
	e areas subject to spills inspect- daily when in use?	<u> </u>		
an	es the owner or operator maintain inspection log or summary of ner or operator inspections?	<u></u>		SAPETY INSPECTIONS + GUARD INSPECTION
	es the inspection log contain the llowing information:			
i.	the date and time of the inspection?	<u></u>		
ii.	the name of the inspector?	<u></u>		
iii.	a notation of the observations made?	<u> </u>	****	
iv.	the date and nature of any repairs or remedial actions?	<u></u>		work orders
	training records 265.16		W	NO RECORDS.
a. Jo	b titles?			ALL TRAINING IS INFORMAL,
b. Jo	b descriptions?		L	ON-THE JOB.

5.

			YES.	NO	NI	Remarks
	c.	Description of training?				
	d.	Records of training?				
	e.	Did facility personnel receive the required training by 5-19-81?			V	
	f.	Do new personnel receive required training within six months?				
	· 9.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?			V	,
5.	req or	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.17 Special handling?			i	NA - NOT IGNITABLE,
		No smoking signs?				INCOMPATIBLE.
	c.	Separation and protection from ignition sources?				-

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

		ntenance ar Facility:	d Operation 265.31	v	ES	NΛ	NI	Remark s
	ę	explosion,	ny evidence of fire or release of waste or hazardous cituent?		<u>(</u>	**************************************		STACK CAUGHT ON FIRE TYP AGO, PUT
2.			does the facility owing equipment:	265.32				OUT PROMPTEN,
	g.	Internal alarm syst	communications or tems?	, –	V	,	<u></u>	
	b.		or 2-way radios ene of operations?		<u></u>			TELEPHONES, PACING SYSTEM
	с.	fire cont	fire extinguishers rol, spill control and decontaminati?	-	<u>V</u>			
	Ind	icate the	volume of water an	d/or foam a	vai	lable	for fir	e control:
		54,00	O GALLONS	IN 70	ن	ER	FOR	SPRINKLERS
			DAM EXTING					
3.		sting and M ergency Equ	aintenance of ipment: 265.33					
	a.	establish maintenan	wner or operator ed testing and ce procedures ency equipment?	_	V			
	b.		ncy equipment d in operable ?	-	<u>/</u>	garden derrolle de l'annua		
4.	imn		operator provided ess to internal needed) 265.34		V			
5.			uate aisle space ted movement?	-	V	-		
6.	to aut	make arrar	or operator attengements with local n case of an emergity?		<u>/</u>	-		FIRE DEPT + WASTEWATER TREATMENT PRANT

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

		·	YES	NO	NI	Remarks
• .		the Contingency Plan contain the lowing information: 265.52				PIPT, ALSO HAVE
		The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)				SEPARATE FIRE PLAN
	b.	Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	<u> </u>			HAVE ARRANGEMENTS WITH LOCAL AGENCIES INCLUDING CONTRACT WITH WWTP BUT NOT IN PLAN, CONTRACTORS
	C.	Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	V	/		FOR CLEADUR & HAUCING- LISTED IN PLAN
	d.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?		·	, 	
	e.	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	<i>V</i>		·	BRIEF DISCUSSION IN FIRE PLAN, BUT SIGNALS, ROUTES NOT INCLUDED
2.	ava	e copies of the Contingency Plan silable at the site and local		V	,	

			ILS NO	MI	Remarks
•	Eme	rgency Coordinator 265.55			
	a.	Is the facility Emergency Coordinator identified?			
	b.	Is coordinator familiar with all aspects of site operation and emergency procedures?	<u> </u>		·
	с.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u> </u>		
•	E me	rgency Procedures 265.56		÷	
	at Coo	an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency		/	NA-NONE OCCURRED

		•		Section E:	MANIFEST	SYSTEM,	RECOR	DKEE	PING,	AND REP	ORTING:	(Part 265 Subpart E)
								YES	NO	NI	Remarks	5
* *	1.	Use a.	Doe pro	Manifest Systems the facil occurred listocessing each	ity follo ted in §2 n manifes	65.71 for t?					N'A	~ .
			the ger	articularly articularly articularly man man merator with livery.)	ifest bac	k to the		-				
		b.		e records of tained for 3		pments				<i>∨</i>		
* *	2.	req	uire	ne owner or ements regar pancies?						_	<i>N</i> 'A	
**	of	on-s	ite	able to owne facilities y waste from	that do n	ot				L.	, MA	-
	3.	0pe	rat:	ing Record	265.73					·		•
		a.	ma red	es the owner intain an op cord as requ 5.73?	erating	tor			-		-	
		b.	CO	es the opera ntain the fo formation:		rd						
			i.	The method of each wa storage, o required i Appendix I	ste's tre r disposa n 40 CFR	atment, las						
			ji.	The locati each hazar facility? should be to specifi if waste w by a manif	dous wast (This in cross-ref c manifes as accomp	e within formation erenced t number,	the n		anni kulturan ya ku			
		***j	ii.	A map or d cell or di						e .	NA	

E-1

4/82-A

*** only applies to disposal facilities

	•		1F2	NU	N1	kema rk s
		showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)		•	· ·	NA
	iv.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?		<u></u>	<u>_</u>	N. A.
	٧.	Reports detailing all incidents that required implementation of the Contingency Plan?			<u></u>	_ ~ ^
	vi.	All closure and post closure costs as applicable?			<u></u>	NA
1.	Availa	bility of Records 265.74				·
		l facility records required 40 CFR Part 265 available for tion?	$\frac{}{}$			
5.*	**Unmani	fested Waste Reports 265.76			i	NA
	ha ge wi	s the facility accepted any zardous waste from an off-site nerator subject to 40 CFR 262.20 thout a manifest or or shipping per?				
	of de an	"a" is yes, provide the identity the source of the waste and a scription of the quantity, type, d date received for each unmanisted hazardous waste shipment.				
					-	•

^{**} Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

1.	fac wat	the owner or operator of the ility implemented a ground-er monitoring system? 265.90	YES NO	— N1	-	HYDROGEO STUBY, 5 NEW WELLS 1N (JUNE 82)
2.	fac gro	the owner or operator of the ility implemented an alternate undwater monitoring system as cribed in 265.90(d)?	MH V		NEU.	HYDROGEO STUDY NOW IN PROGRESS, HOWEVER
	If If	"yes", skip to number 12. "no", continue				
3.	sys	s the groundwater monitoring tem meet the following re- rements of 265.91:				•
	a.	At least one well installed hydraulically up-gradient from the limit of the waste management area?	<		,	TWO
		Indicate the total number of up-gradient wells.				
	b.	At least three wells installed hydraulically down-gradient at the limit of the waste management area?	V	_		NOW HAVE 5 BUT BEFORE JONE '82 HAD ONLY 2
		Indicate the total number of downgradient wells.			<i></i>	, 85 HAP ONTA 5
	c.	Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?	<u> </u>			ORIGINALLY APPROVED BY DUR

Sketch the locations of the wells relative to the waste management area.

SKETCH IS ATTACHED,
(PROVIDED BY CO.)
INCLUDES ONLY ORIGINAL
POUR WELLS.

			YES	NO	NI	Remarks
	d.	Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?	/		Workstern	DIALRAMS NOW AT 14A, BUT ORALLY BESCRIBED AS MEETING THESE
4.	dev wat pla	the owner or operator eloped a written ground- er sampling and analysis n that includes procedures techniques for: 265.92				REQUIREMENTS
	a.	Sample collection?		✓—	-	CO, BOES DWN SAMPCING AND ANALYSIS!
	b.	Sample preservation and shipment?	-			PROCEDURE NOT
	c.	Analytical procedures?				WRITTEN DOWN
	ď٠	Chain of custody control?			*****	
5.	fol	s the owner or operator low his groundwater sampling analysis plan?			✓–	
6.	ana	the groundwater sampling and lysis plan maintained at the ility?	·		V	
7.	min of par anc	the owner or operator deter- led the concentration or value all the groundwater monitoring maneters of 265.92(b) in accord- e with paragraphs c and d of 1.92?	▶	-		NOT REQUIRED FOR ORIGINAL WELLS WHEN FIRST INSTALLED, BUT NOW BEING DONE BY JAA FOR NEW STUDY.
		F-	2			4/82-A

Is the waiver demonstration maintained at the facility?

b. Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?

Note: Inspectors should request a copy of the waiver document.

c. Skip questions 12, 13, and 14.

^{*}These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

		123	110	14.7	Velia i K 2
12.	Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?		<u>~</u>	, _	
	a. Has the plan been certified by a qualified geologist or geotechnical engineer?				
	: If the plan for an alternate ground he Regional Administrator the inspecto				
13.	Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?	····			
14.	Does the owner or operator submit reports and maintain records as required in 265.94?				

		•	Section GUSURE AND PUS	I CL	USURE	(Part	5 Subpart G)
	•		•	YES	NO	NI	Remarks
١.	Clo	sure	265.112				
	a.		the facility closure n available for inspection?	<u> </u>			
	b.	Does	s the plan identify:				
		i.	maximum extent unclosed dur- ing facility life?	<u> </u>			
		ii.	maximum hazardous waste in- ventory?	<u></u>	***************************************	-	HAVE INVENTORY PLANT
		iv.	estimated year of closure?		<u></u>		BASED ON MAK,
		٧.	schedule of closure activities?				
	c.	Has	closure begun?		1		•
2.	Pos	st-Cl	osure 265.118			L-	NA
	a.		the post-closure plan available inspection?		*****		
	b.	Does	s this plan contain:				•
		i.	description of groundwater monitoring activities and frequencies?			****	
		ii.	description of maintenance activities and frequencies for				
			AA. integrity of cap, final cover, or containment structures, where applicable		*****	****	
			BB. facility monitoring equip-				
	j	iii.	name, address, and phone number of person or office to contact during post-closure care period?				
	c.	Has	the post-closure period begun?				
	d.	Is ·	the written post-closure cost imate available? 265.144			***************************************	

Section J - TANKS (Part 265, Subpart J)

		YES	NO	NI	Remarks	
1.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	✓—	<u></u>			
2.	Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?	V	/			
3.	Do continuous feed systems have a waste-feed cutoff?			<i>V</i>	NA	- ALL BATCH SYSTEMS
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?	265.1	93		<i>V</i>	NA
5.	Are required daily and weekly inspections done? 265.194		<u></u>			
6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	55.198	3		<i>\\</i>	NA-NOT IGNITABLE OR REACTIVE
7.	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)		✓	<i>_</i>		CN AND ACID WASTES
8.	Has the owner or operator observed to buffer zone requirements for tanks of					
	Tank capacity: gallons		3		MA	
	Tank diameter:feet					
	Distance of tank from property li	ne				feet
	(See table 2 - 1 through 2 - 6 of					
	Code - 1977" to determine complia			i i gunuk	DIE AIM	Compasciote Elquius

Section K -	SURFACE	IMPOUNDMENTS	(Part	265.	Subpart	K)	ļ

,	De confere describente barre	YES	NO	NI	Remarks .
1.	Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222	_			
2.	Do earthen dikes have protective covers? 265.224	<u> </u>			Vegetation
3.	Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225			✓ 	WA
4.	Is the freeboard level inspected at least daily? 265.226	•••••••••••••••••••••••••••••••••••••••	<u></u>		NOTHING IS BEING ADDED
5.	Are the dikes inspected weekly for evidence of leaks or deterioration?				
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229			<u>.</u>	NA
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230	•		L	NA

Section A: Scope	Jecui	O11	Α.	S.C.	υνι
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1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

			YES	NO	NI	Ren	arks		- •
(1)	Doe ava	s the operator have copies of the manifest ilable for review? 262.40	· V			. <u></u>	· · · · · · · · · · · · · · · · · · ·		
(2)	mon	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.	<u> 8</u> -	- S	OME	AR	€ N	ON -1	hazar Astes
(3)	fol cop fes	the manifest forms examined contain the lowing information: (If possible, make lies of, or record information from, manit(s) that do not contain the critical ments). 262.21					(29 6)) W	
	а.	Manifest document number?	V		·				<u> </u>
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	<u>v</u>		*				
	с.	Name and EPA ID Number of Transporter(s)?	<u></u>		_				
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	V		***************************************				
	е.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u></u>		•		··········		
	f.	The total quantity of waste(s) and the type and number of containers loaded?	<u> </u>						
	g.	Required certification?	~			. <u></u> -			
	h.	Required signatures?		<i></i>		. <u> </u>		· · · · · · · · · · · · · · · · · · ·	
(4)	Rep	portable exceptions 262.42					•		
	a.	For manifests examined in (2) (except for enter the number of manifests for which the signed copy from the designated facility we ment.	e gene	rato	has	NOT 1	receive	ed a	-
		enter the number of manifests for which the signed copy from the designated facility w	e gene ithin numbe	eratoi 35 da er foi	has ays of whic	NOT the	receive date date	ed a of ship)-

Sact	ion	C: PRE-TRANSPORT REQUIREMENTS (Part 262, Su	bpart	C)		
1. D	with (Req	vaste packaged in accordance DOT regulations? Quired prior to movement of	YES	NO	NI V	Remarks SHIPPEDIN BUCK
	naza	rdous waste off-site) 262.30				1500
2.	in a cond (Red	waste packages marked and labeled accordance with DOT regulations cerning hazardous waste materials? quired for movement of hazardous te off-site) 262.31 262.32			V	NOT IN PACKAGE
3.	If r tran	required, are placards available to nsporters of hazardous waste? 262.33	<u></u>		<u></u>	HAULER HAS OWN ALSO CO. 14AS SOME
4.	wast with and to	site accumulation of generated hazardous wast te it generates either (A) in its storage fac h 40 CFR 262.34 [see 265.1(c)(7)]. Option B containers. If the installation elects opt Section D. If the installation elects options: See 40 CFR 262.34 January 1], 1982 Rev	cility restr ion A, n B, c	[265] icts chec	l(b)] all ac k this	or (B) in accordance cumulation to tanks box and skip
	ā•	Is each container clearly marked with the start of accumulation date?		<u></u>	<u>. — .</u>	NOT IN CONTRING
	b.	Have more than 90 days elapsed since the date inspected in (a)?	. <u> </u>		· _	
	С.	Do wastes remain in accumulation tanks for more than 90 days?		<u> </u>		
	d.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?			· _	Nhunber Ground
Sec	ction	D: - RECORDKEEPING AND REPORTING (Part 262,	, Subpa	rt D)	i	
			YES	5 NO	NI	Remarks
1.	nee mir	e all test results and analyses eded for hazardous waste deter- nations retained for at least ree years? 262.40	V		_	
<u>Se</u>	ction	n E: - INTERNATIONAL SHIPMENTS (Part 262, Sub	bpart 1	Ξ)		
1.	Ha: exp	s the installation imported or ported Hazardous Waste? 262.50		L		
		f answered Yes, complete the following applicable.)				
	a.	Exporting Hazardous waste; has a generator:				